



DRAFT MITIGATED NEGATIVE DECLARATION

WARD: 3

1. **Project Number:** PR-2021-000770
2. **Project Title:** Orangecrest Community Church
3. **Hearing Date:** TBD
4. **Lead Agency:** City of Riverside
Community & Economic Development Department
Planning Division
3900 Main Street, 3rd Floor
Riverside, CA 92522
5. **Contact Person:** Danielle Harper-Scott, Assistant Planner
Phone Number: (951) 826-5371
6. **Project Location:** 5695 Glenhaven Avenue, City of Riverside, CA 92506

The Project address is 5695 Glenhaven Avenue, Riverside, CA 92506. The Assessor's Parcel Number (APN) is: 222-250-006. The Project site is at the northwest corner of Glenhaven Avenue and Alessandro Boulevard and is located west of State Route 91 (SR-91) and generally along the western portion of the City; refer to **Exhibit 1, Regional Vicinity**. The site is located within the Riverside East, California USGS 7.5-minute Topographic Quadrangle Map, Township 2 South, Range 5 West, Section 36.

The Project site is surrounded by single-family residential to the north, south, east, and west; refer to **Exhibit 2, Local Vicinity**. Surrounding roadways that provide access to the site include Glenhaven Avenue and Alessandro Boulevard.
7. **Project Applicant/Project Sponsor's Name and Address:**
Orangecrest Community Church
Contact: Jon McWhorter
P.O. Box 2799
Riverside, CA 92516
(951) 215-0563
8. **General Plan Designation:** LDR - Low Density Residential
9. **Zoning:** R-1-13000 - Single Family Residential
10. **Description of Project:** (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary.)

Physical Setting

The Project site is 5.27 acres in size and abuts Alessandro Boulevard which is located to the south, Glenhaven Avenue which is located to the east, a natural slope which is located to the west, and single-family residential development which is located to the north, south, and east. The Project site's former use was a swim and tennis club. The pool was previously filled in. Two existing buildings that remain onsite from previous use were used for locker rooms, a snack bar, a pro shop, and as an activity room. The Project site also includes a parking lot area, as well ruderal/weedy vegetation, non-native plants, grasses, shrubs, and trees scattered throughout the Project site and along the roadway frontages. There are three power poles along the existing 20' foot-wide public utilities easement, a control building, and a transformer pad with manhole.

Conservation

The Project site is located within the boundaries of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). According to the Western Riverside County Regional Conservation Authority (RCA) MSHCP map, the Project site is located within the Burrowing Owl (*Athene cunicularia*) survey area. However, the site is not in a criteria Cell group, not in an amphibian survey area, not in a mammal survey area, and not in a narrow endemic plant survey area.¹ The Project has been designed to avoid grading or encroachment within the existing natural drainage area along the site's western perimeter.

Demolition

The existing tennis courts and other associated structures will be removed, not including the two existing buildings which are generally located on the eastern part of the site. These two buildings were formerly used as locker rooms, snack bar, pro shop, and as an activity room. These two buildings are single story structures of masonry block construction and are assumed to be supported on shallow foundations with a concrete slab-on-grade floor which will be renovated in place. The Project will require approximately 6,123 Cubic Yards (CY) of (cut) and 2,644 CY (fill) for a net 3,480 CY of soil export.

Construction

Project construction would occur in four phases, as shown below:

- Phase 1: Includes the renovation in place of the existing buildings (Buildings A and B). Building A will be utilized as accessory office/meeting space and Building B would be utilized as religious meeting hall.
- Phase 2: Includes the construction of Building C. Building C will be the main worship building.
- Phase 3: Includes the construction of Building D. Additionally, existing Buildings A and B will be expanded. The expansion is identified in the site plan as (A1 and B1). Other construction activities include landscape, hardscape, and other associated amenities. Building D will be utilized as a religious nursery/daycare building (will not operate mid-week); Building A1 will be utilized as a café; and Building B1 entail the expansion of the existing children's ministry building.
- Phase 4: Includes the construction of Building E which will serve as the youth ministry building.

The total construction timing for all 4 phases is anticipated to take approximately 2.5 years (29 months).

A breakdown of the proposed buildings is provided below in **Table 1, Proposed Project Structures and Other Components**.

¹ RCA. 2020. *MSHCP Information Map*. Available at <http://wrcrca.maps.arcgis.com/apps/webappviewer/index.html?id=a73e69d2a64d41c29ebd3acd67467abd>. Accessed on August 19, 2020.

Table 1: Proposed Project Structures and Other Components

Building	Purpose	Building Height	Building Area (SF)
Existing			
“Building A”	<i>Locker Room</i>	15’-6”	2,488.89
“Building B”	<i>Snack Bar</i>	20’-6”	1,583.09
Existing Building SF Total			4,071.98
Phase 1			
Building A	<i>Renovate in Place Administration Building</i>	15’-6”	N/A
Building B	<i>Renovate in Place Children’s ministry building/Religious Meeting Hall</i>	20’-6”	N/A
Phases 2 and 3			
Building C	Worship Building	32’-6” with 40’-0” Tower	8,394.46
Building D	<i>Religious Nursery/Daycare Building</i>	20’-0”	3,687.83
Building A1	<i>Expansion – Admin/Café</i>	15’-6”	729.79
Building B1	<i>Expansion - Children’s Ministry Building/Religious Meeting Hall</i>	20’-6”	1,587.38
Phase 4			
Building E	Youth Ministry Building	16’-0”	1,473.81
Total (Existing + Proposed) Building SF			19,945.25

Church classrooms and building design features would include high-efficiency wall assemblies and windows to reduce heating and cooling loads; Energy Star appliances; high-efficiency heating and cooling systems; high efficiency domestic hot water systems; and high-efficiency light-emitting diode (LED) lighting throughout common areas, and landscape design. The Project would be constructed in four phases.

The Project includes 264 surface parking spaces which will be provided for visitors along the northern, southern, and western portions of the site. The Project would include two access driveways along Glenhaven Avenue. As shown in **Exhibit 3a-3d, Site Plan**, the proposed structures would be generally located in the eastern portion of the Project site. The proposed Project includes 26,162 SF of parking lot landscaping, 24,021 SF of setback landscape area, and 37,187 SF of additional landscape area (including the 3 retention/infiltration basins), totaling 87,370 SF of onsite landscape (38% of the Project site).

An event lawn with a 250-person capacity is proposed on the southwest corner of the site. Additionally, two bio basins are provided along Alessandro Boulevard and one on the northeast corner of the Project site. Street trees are proposed along the Alessandro Boulevard right-of-way (ROW) (*Cascabella thevetia*) and along the Glenhaven Avenue ROW (*Pistacia atlantica Red Push*). The existing 31 palms and 24 other trees are anticipated to remain at entries and street perimeter where possible.² Note that the existing pepper trees along the existing southern and southwestern perimeter would be removed. Additionally, the Project anticipates providing 78 new trees; that is, 10 more trees than required by the City; refer to **Exhibit 4, Landscape Plan**.

The total duration of construction activities associated with the Project is estimated to be approximately 2.5 years (29 months). Construction is expected to begin in the third quarter (Q3) of 2021 and end during the last quarter (Q4) of 2023. Construction activities would include site preparation, approximately 6,123 Cubic Yards (CY) of (cut) and 2,644 CY (fill) for a net 3,479 CY of soil export. Project construction will

² CDPC. June 5, 2020. Conceptual Landscape Site Plan.

include buildings, paving, and architectural coating. Construction would occur primarily on the eastern portion of the site approximately 110 feet from the nearest sensitive receptors to the north and approximately 150 feet from the nearest sensitive receptors to the east. However, although construction activities would occur throughout the Project site, construction activities would avoid areas directly adjacent to sensitive receptors. Sensitive receptors identified within a one-mile radius of the project site include: single-family residential dwellings and neighborhoods, Church on The Hill, Alcott Elementary, Riverside Poly High School, and Andulka Park.

Operations

The Project anticipates retaining six full-time employees and seven part-time employees. The administration/office operating hours would be Mon-Fri from 8am-5pm. Initially, 2 worship services will be held for Sunday morning service activities which will be held from 9am to 11:30am. Eventually, primary worship services will occur up to 3 times on Sunday mornings from approximately 9am to 1pm. Midweek gatherings and events are anticipated to occur as follows:

- Small gatherings (i.e. 5-20 people) most weeknights (M-F), approximately 7pm to 9pm.
- Occasionally, the property will be utilized for monthly special events of larger gatherings (larger than 20 people) on a Friday or Saturday evening, approximately from 6pm to 9pm.

Additionally, youth and children’s ministries would have a weekly gathering (i.e., Wednesday) from approximately 6:30pm to 8:30pm.

All activities would comply with the City’s municipal code including limitations on noise, lighting and parking. The Project and associated activities are those associated with a place of worship and does not include formal “school classrooms” or similar weekday daily school uses that would generate weekday traffic.

Access

Regional access is provided via SR-91 via the Central Avenue and Arlington Avenue ramps, approximately 1.5-miles to the west of the site. Site access is from Glenhaven Avenue via two driveways. The intersection of Glenhaven Avenue and Alessandro Boulevard is signal controlled with a dedicated southbound left-turn lane and right-turn lane.

The proposed Project evaluates the following development applications:

Conditional Use Permit (CUP) No. DP-2021-00027: To permit an assembly of people – non entertainment (church) as reflected in the Site Plan (**Exhibit 3**).

Design Review (DR) No. DP-2021-00029: Review of site design and building elevations.

Variance (VR) No. DP-2021-00580: To allow a reduced landscape setback.

Grading Variance (GE) No. DP-2021-00580: To allow a retaining wall, open to public, view higher than 3-feet .

The purpose of this Initial Study is to evaluate the potential environmental effects associated with construction and occupancy of the planned development Project and to provide mitigation where necessary to avoid, minimize, or lessen environmental effects.

11. Surrounding land uses and setting: Briefly describe the project’s surroundings:

Table 2: Existing Land Uses and Zoning Designations

	Existing Land Use	General Plan Designation	Zoning Designation
Project Site	Former swim and tennis club	LDR - Low Density Residential	R-1-13000 Single Family Residential
North	Residential	LDR - Low Density Residential	R-1-13000 Single Family Residential

	Existing Land Use	General Plan Designation	Zoning Designation
East	Residential	LDR - Low Density Residential	R-1-13000 Single Family Residential P Park
South	Residential, Swanson Park	LDR - Low Density Residential , (P) Public Park	R-1-13000 Single Family Residential
West	Residential	LDR - Low Density Residential	R-1-13000 Single Family Residential

Source: <https://riversideca.gov/cedd/sites/riversideca.gov.chedd/files/pdf/planning/general-plan/ResZoneFinal.pdf>

12. Other public agencies whose approval is required (e.g., permits, financial approval, or participation agreement.):

- Permit for Water Quality Management Plan

13. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significant impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

On July 23, 2020, the City initiated tribal consultation with interested California Native American tribes consistent with Assembly Bill (AB) 52. The City requested a consultation from the following tribes which have previously requested consultation: Rincon Band of Luiseño Indians, Agua Caliente Band of Cahuilla Indians; and Soboba Band of Luiseño Indians.

Consultation with the Rincon Band of Luiseño Indians concluded that the standard conditions included in Section 5, Cultural Resources are adequate and accepted by Rincon Band of Luiseño Indians, if Band of Cahuilla Indians; and Soboba Band of Luiseño Indians also accept them.

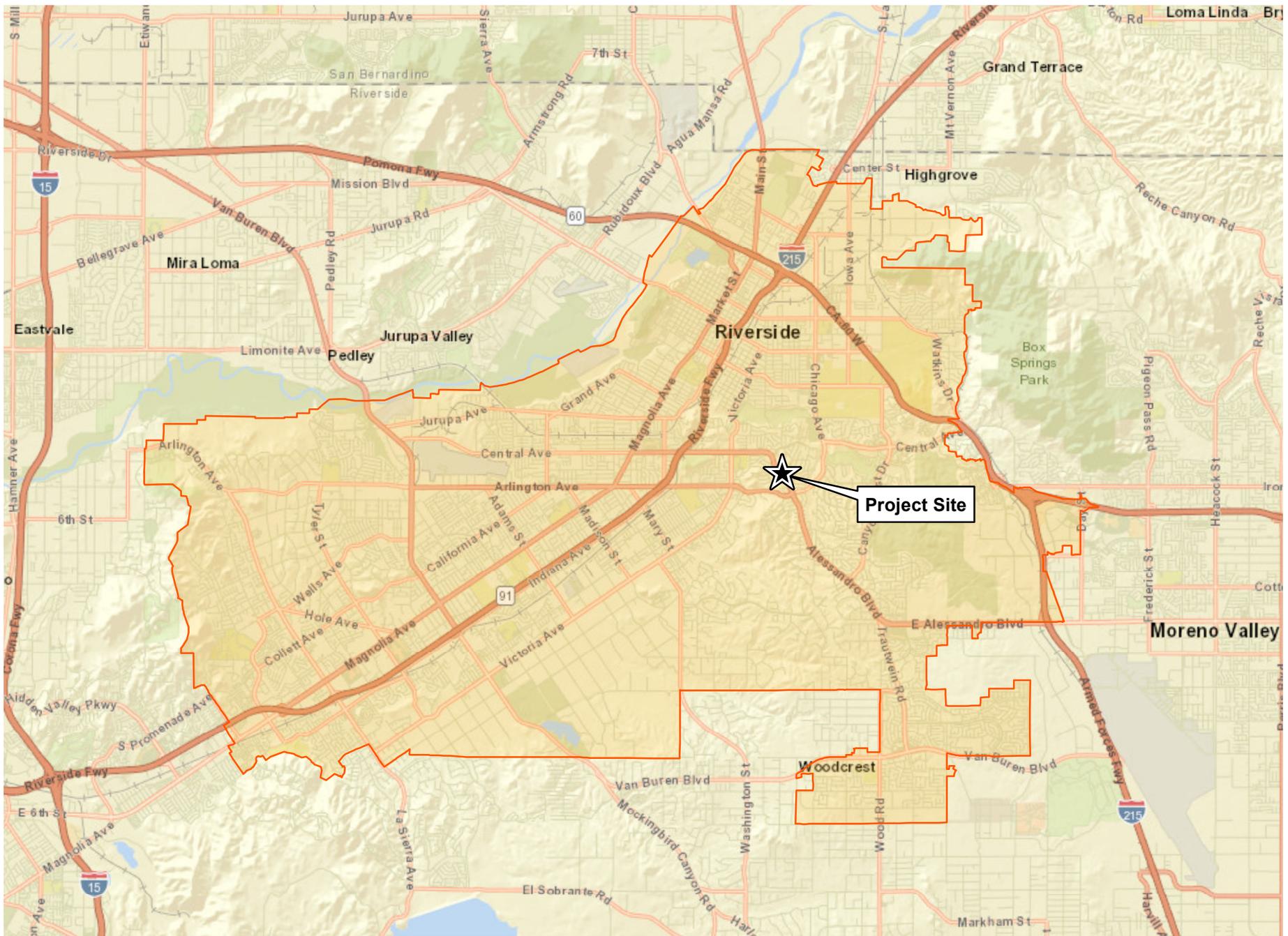
14. Other Environmental Reviews Incorporated by Reference in this Review:

- a. Riverside General Plan 2025 (GP)
- b. GP 2025 Final Program Environmental Impact Report (FPEIR)
- c. Technical Studies:
 - i) Air Quality Assessment Memorandum (Kimley-Horn, October 22, 2020)
 - ii) Greenhouse Gas Assessment Memorandum (Kimley-Horn, October 22, 2020)
 - iii) Noise Memorandum (Kimley-Horn, October 22, 2020)
 - iv) Focused Traffic Impact Analysis & Parking Analysis (Kimley-Horn, November 2020)
 - v) Biological Resources Assessment/Jurisdictional Delineation & Consistency Analysis (Jericho Systems, October 1, 2020)
 - vi) Preliminary Cultural Resources Report (BCR Consulting LLC, October 22, 2020)
 - vii) Geotechnical Report (SoCalGeo, TBD)
 - viii) Phase I Environmental Site Assessment (FirstCarbon Solutions, June 11, 2015)
 - ix) Water Quality Management Plan (KWC Engineers, June 1, 2020)

15. Acronyms

- AICUZ - Air Installation Compatible Use Zone Study
- AQMP - Air Quality Management Plan
- AUSD - Alvord Unified School District
- CEQA - California Environmental Quality Act
- CMP - Congestion Management Plan
- EIR - Environmental Impact Report
- EMWD - Eastern Municipal Water District
- EOP - Emergency Operations Plan
- FEMA - Federal Emergency Management Agency

FPEIR -	GP 2025 Final Programmatic Environmental Impact Report
GIS -	Geographic Information System
GHG -	Greenhouse Gas
GP 2025 -	General Plan 2025
IS -	Initial Study
LHMP -	Local Hazard Mitigation Plan
MARB/MIP -	March Air Reserve Base/March Inland Port
MJPA-JLUS -	March Joint Powers Authority - Joint Land Use Study
MSHCP -	Multiple-Species Habitat Conservation Plan
MVUSD -	Moreno Valley Unified School District
NCCP -	Natural Communities Conservation Plan
OEM -	Office of Emergency Services
OPR -	Office of Planning & Research, State
PEIR -	Program Environmental Impact Report
PW -	Public Works, Riverside
RCALUC -	Riverside County Airport Land Use Commission
RCALUCP -	Riverside County Airport Land Use Compatibility Plan
RCP -	Regional Comprehensive Plan
RCTC -	Riverside County Transportation Commission
RMC -	Riverside Municipal Code
RPD -	Riverside Police Department
RPU -	Riverside Public Utilities
RTIP -	Regional Transportation Improvement Plan
RTP -	Regional Transportation Plan
RUSD -	Riverside Unified School District
SCAG -	Southern California Association of Governments
SCAQMD -	South Coast Air Quality Management District
SCH -	State Clearinghouse
SKR-HCP -	Stephens' Kangaroo Rat - Habitat Conservation Plan
SWPPP -	Storm Water Pollution Prevention Plan
USGS -	United States Geological Survey
WMWD -	Western Municipal Water District
WQMP -	Water Quality Management Plan



Source: ESRI World Street Map

EXHIBIT 1: Regional Vicinity
Orangecrest Community Church

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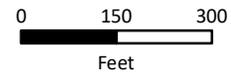




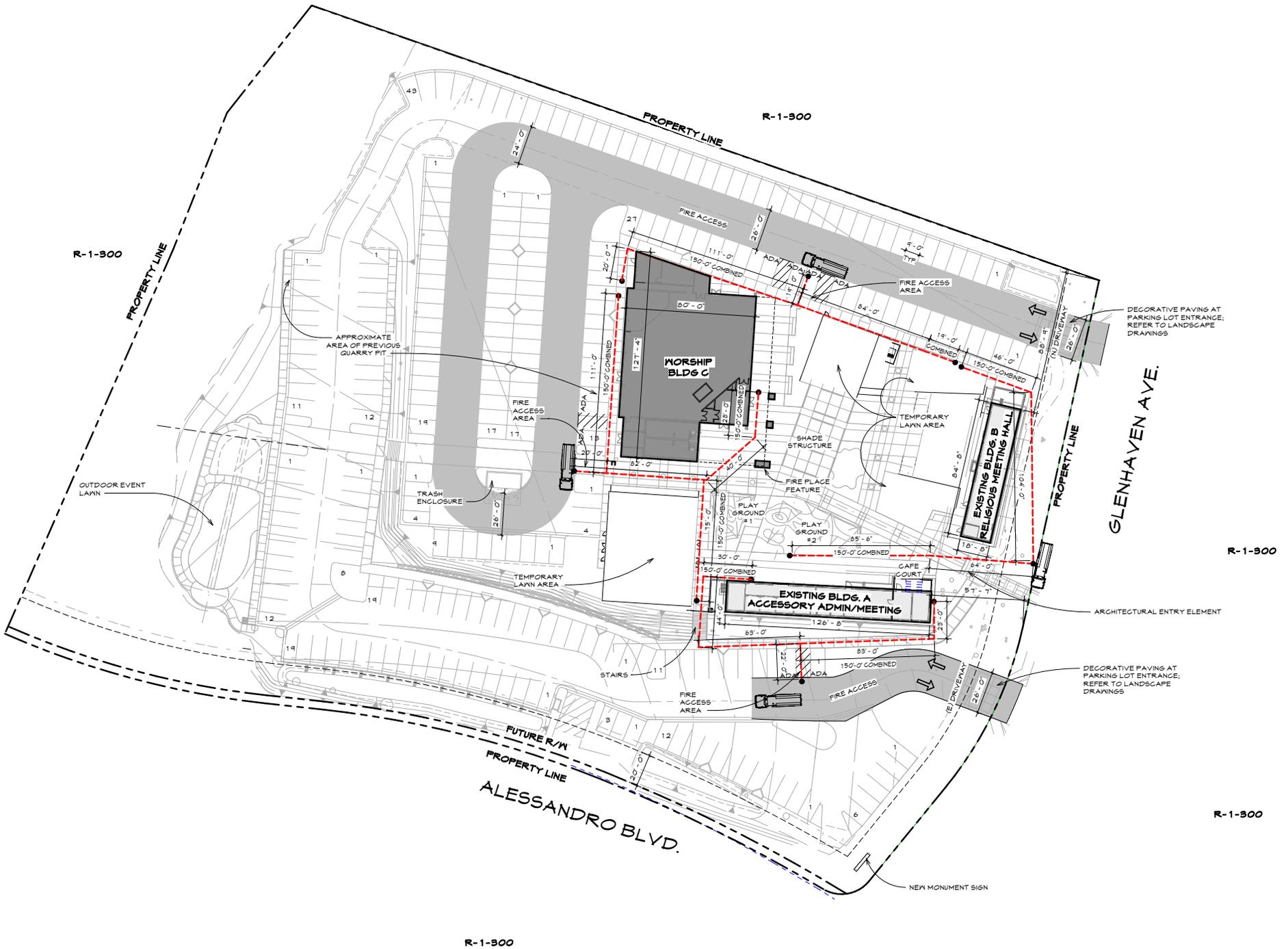
Source: ESRI World Imagery

EXHIBIT 2: Local Vicinity
Orangecrest Community Church

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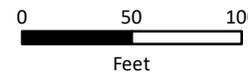
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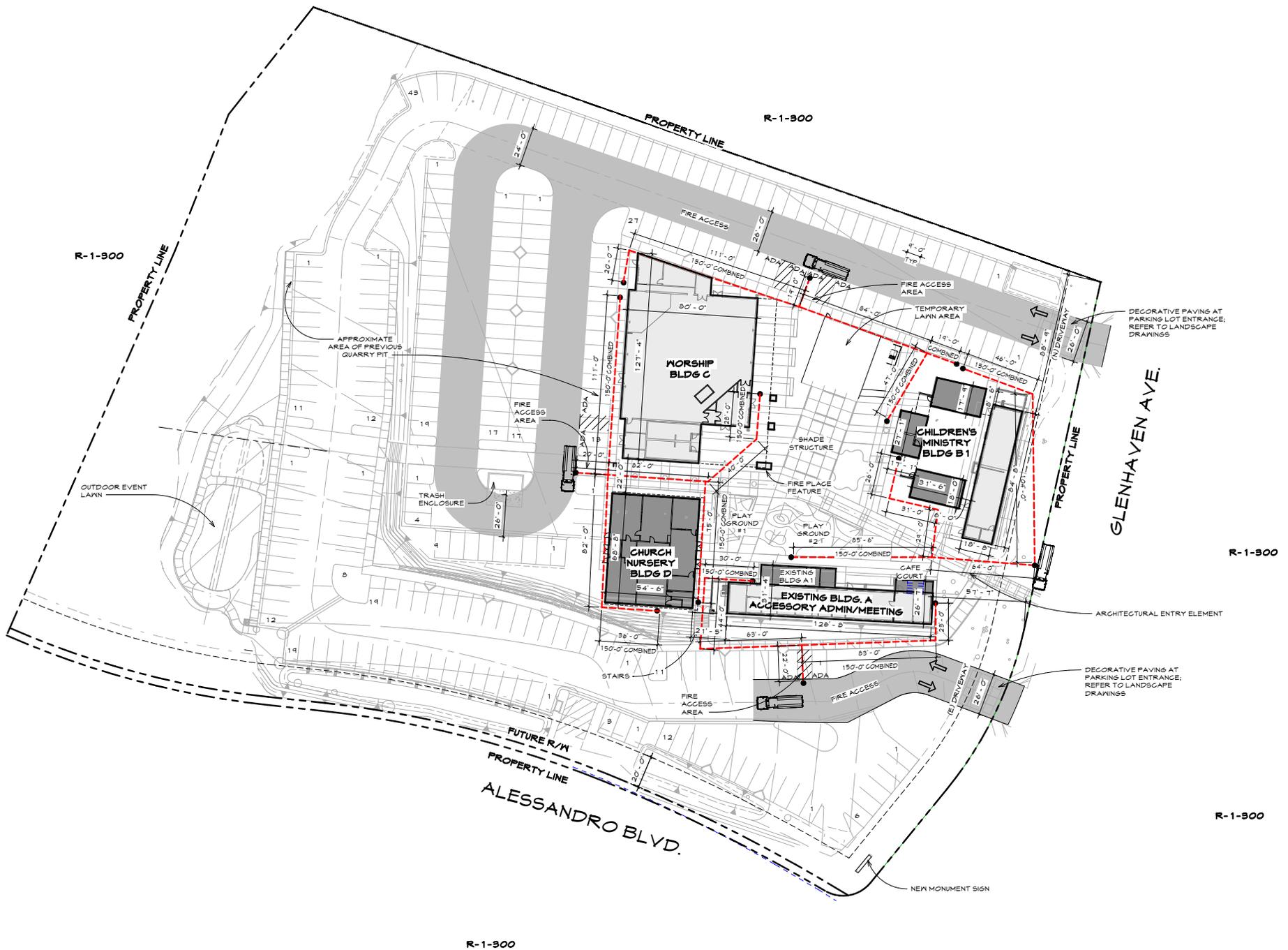
Source: KWC ENGINEERS

EXHIBIT 3b: Phase 2 Site Plan
Orangecrest Community Church

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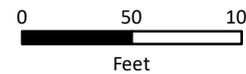


Kimley»Horn



Source: KWC ENGINEERS

EXHIBIT 3c: Phase 3 Site Plan
Orangecrest Community Church



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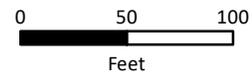
Kimley»Horn



Source: Conceptual Design & Planning Company

EXHIBIT 4: Landscape Plan
Orangecrest Community Church

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Kimley»Horn

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture & Forestry Resources | <input type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input type="checkbox"/> Geology & Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials |
| <input type="checkbox"/> Hydrology & Water Quality | <input type="checkbox"/> Land Use & Planning | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Population & Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities & Service Systems | <input type="checkbox"/> Wildfire | <input type="checkbox"/> Mandatory Findings of Significance |

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation which reflects the independent judgment of the City of Riverside, it is recommended that:

The City of Riverside finds that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

The City of Riverside finds that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

The City of Riverside finds that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

The City of Riverside finds that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

The City of Riverside finds that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature _____

Date _____

Printed Name & Title Danielle Harper-Scott/Assistant Planner

For City of Riverside

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. **Earlier Analysis Used.** Identify and state where they are available for review.
 - b. **Impacts Adequately Addressed.** Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. **Mitigation Measures.** For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measure which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) The explanation of each issue should identify:
 - a. the significance criteria or threshold, if any, used to evaluate each question; and
 - b. the mitigation measure identified, if any, to reduce the impact to less than significance.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
1. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>1a. Response: (Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, General Plan 2025 FPEIR Figure 5.1-1 – Scenic and Special Boulevards and Parkways, Table 5.1-A – Scenic and Special Boulevards, and Table 5.1-B – Scenic Parkways)</p> <p>Less than Significant Impact. According to page 5.1-2 of the General Plan 2025 FPEIR, the hills and ridgelines that surround the City provide scenic vistas to residents of the City where they can experience long distance views of natural terrain. Vista points can be found throughout the City, both as viewed from urban areas toward the hills and from wilderness areas toward Riverside. The most notable scenic vistas in the City include the La Sierra/Norco Hills (8.6 miles southwest), Sycamore Canyon Wilderness Park (2.0 miles east), and Box Springs Mountain Regional Park (4.0 miles east). The peaks of Box Springs Mountain (4.45 miles northwest), Mt. Rubidoux (3.2 miles northwest), Arlington Mountain (8.5 miles southwest), and the La Sierra/Norco Hills (8.6 miles southwest) provide scenic views of the City and the region.</p> <p>According to Figure LU-3 of the General Plan, there are no scenic vistas in the immediate vicinity of the Project site. Additionally, on Figure CCM-4 and in Table 5.1-A of the General Plan and FPEIR, accordingly, portions of Alessandro Boulevard and Arlington Avenue are designated as a scenic boulevard. No scenic boulevard designated portion of Alessandro Boulevard or Arlington Avenue cross the Project site, nor are these sections visible from the Project site. The Project site is located approximately 0.3 miles north of the Alessandro Boulevard/Arlington Avenue intersection. Although the proposed Project would alter the Project site by replacing the existing buildings with new ones, implementation of the Project will not impair any views of the distant natural vistas since the Project site is located in a developed urban area. Additionally, the proposed buildings would have the following maximum heights: Building A is approximately 11’ feet high with canopy, Building B is 20’ 6” with canopy, Building C is the tallest at 32’ 6” at the top of the buildings and at 40’ at the tower, Building D is 20’ feet high, and Building E is 16’ feet high; refer to Exhibit 5a – 5k, Color Elevations and Renderings.</p> <p>Finally, the proposed Project would not be located in an area designated as an official scenic vista, nor would it block the view of a scenic vista from an adjacent facility or residents in the vicinity. Therefore, there would be a less than significant impact.</p>				
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>1b. Response: (Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, General Plan 2025 FPEIR Figure 5.1-1 – Scenic and Special Boulevards, Parkways, Table 5.1-A – Scenic and Special Boulevards, the City’s Urban Forest Tree Policy Manual)</p> <p>Less than Significant Impact. The Caltrans California Scenic Highways does not officially designate scenic highways within the City that could be affected by the Project. The nearest State Designated Scenic Highways are SR-30 and SR-330, located in the City of San Bernardino approximately 17 miles north. The General Plan 2025 designates several roadways as Scenic Boulevards and Parkways in order to protect scenic resources and enhance the visual character of Riverside. The proposed Project is located along Alessandro Boulevard which is designated as a Scenic Boulevard within the Circulation and Community Mobility Element of the General Plan 2025. Also refer to Response 1(a), above. As shown of Figure CCM-4, Alessandro Boulevard is designated as a Scenic Boulevard from the eastern part of the City until it intersects with Arlington Avenue, at which point Arlington Avenue becomes a Scenic Boulevard, running west and traversing SR-91.</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>Although the Project site is located along Alessandro Boulevard, the Project site is located approximately 0.3 miles north of the Alessandro Boulevard/Arlington Avenue intersection. As such, no portion of the Project site would be visible from the Scenic Boulevards nor would they be affected by the proposed Project. The following are General Plan 2025 policies intended to minimize aesthetic impacts and impacts on visual resources:</p> <ul style="list-style-type: none"> • Policy OS-2.2: Limit the extent and intensity of uses and development in areas of unstable terrain, steep terrain, scenic vistas, arroyos and other critical environmental areas. • Policy OS-2.3: Control the grading of land, pursuant to the City's Grading Code, to minimize the potential for erosion, land-sliding, and other forms of land failure, as well as to limit the potential negative aesthetic impact of excessive modification of natural landforms. • Policy OS-2.4: Recognize the value of ridgelines, hillsides, and arroyos as significant natural and visual resources and strengthen their role as features, which define the character of the City and its individual neighborhoods. <p>The Project will comply with these policies. The Project will implement design features that are consistent with the general character of the existing community in terms of design, colors, and massing. Additionally, as part of the Project construction, the existing 31 palms and 24 other trees are anticipated to remain at entries and street perimeter where possible, but trees/palms located in the public right-of-way are anticipated to be removed. The intent is to preserve as many of the existing trees as possible. If any trees need to be removed, the Project would comply with the City's Urban Forestry Policy Manual. Finally, there are no significant natural scenic resources on the site as it is fully developed. The site does not contain rock outcroppings or historic buildings. Impacts would be less than significant.</p>				
<p>c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly-accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>1c. Response: (Source: General Plan 2025, General Plan 2025 FPEIR, Zoning Code, Citywide Design and Sign Guidelines)</p> <p>Less than Significant Impact. The proposed Project is required to implement the General Plan 2025 goals and policies and will be subject to Design Review consistent with established Citywide Design and Sign Guidelines. The proposed Project would be located in an urbanized portion of the City with residential uses on all sides of the Project site. As noted in Table 2, all parcels surrounding the Project site, including the Project site, have a LDR - Low Density Residential General Plan land use designation and R-1-13000 Single Family Residential zoning. The proposed use is conditionally permitted under this land use and zoning designation. As such, the proposed Project would not conflict with the applicable zoning or other regulations governing scenic quality. With compliance to the General Plan 2025 goals and policies and the Citywide Design and Sign Guidelines, and due to all these factors, direct, indirect and cumulative impacts on the visual character and quality of the area are less than significant.</p>				
<p>d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>1d. Response: (Source: General Plan 2025, General Plan 2025 FPEIR Figure 5.1-2 – Mount Palomar Lighting Area, Title 19 – Article VIII – Chapter 19.556 – Lighting, Citywide Design and Sign Guidelines)</p> <p>Less than Significant Impact. The proposed Project will not introduce new lighting to the site. The previous use functioning as a swim and tennis club provided lighting throughout the site. The proposed Project will replace existing light fixtures with new lighting fixtures consistent with Chapter 19.556, which should be more energy-efficient and typically associated with residential developments. The anticipated lighting/lighting fixtures would be similar to that</p>				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>which exists in the surrounding area and would not be considered significant. The exterior light sources would be shielded to minimize off-site glare and would not direct light skyward and would be directed away from adjacent properties and public rights-of-ways. Lights anticipated to be mounted on buildings would utilize down-lights with a maximum lumens per fully shielded luminaire of 3,000 lumens. All mounted exterior night and security luminaires will be mounted at a maximum height of 25' feet. A lighting plan will be prepared for Phase 1 of the proposed Project, in accordance with lighting zone 3. Additionally, light poles would not exceed 20 feet in height including the height of any concrete or other base material.</p> <p>Moreover, the site is not within the Mount Palomar Lighting Area. The Mount Palomar Nighttime Lighting Policy Area covers the southeastern portion of the City. This Policy Area represents a radius of 45 miles from the observatory and restricts nighttime lighting hours, types, and techniques of lighting. A portion of the City and the Riverside City Sphere of Influence are within "Zone B" of County Ordinance 655. The Ordinance requires the use of low-pressure sodium fixtures, limits hours of use, prohibits certain types of lights, and requires hooded fixtures which the Project would provide as part of the development of the site. Additionally, the Project site is located 50 miles northeast from the observatory. Therefore, impacts are less than significant.</p>				



Source: Visioneering Studios Architecture

EXHIBIT 5a: Building "A" Elevations
Orangecrest Community Church

\\rvp011CA_RIV\GIS\195272001- Orangecrest Church\5a Color Elevation.mxd

BUILDING A - ADMIN/CAFE



NORTHEAST VIEW



NORTHWEST VIEW



NORTHWEST AERIAL VIEW

ARCHITECTURAL STYLE & CHARACTER



CONTRASTING COLORS WITH NATURAL ACCENTS



PAINTED LAP SIDING STAINED WOOD SIDING



POPS OF COLOR

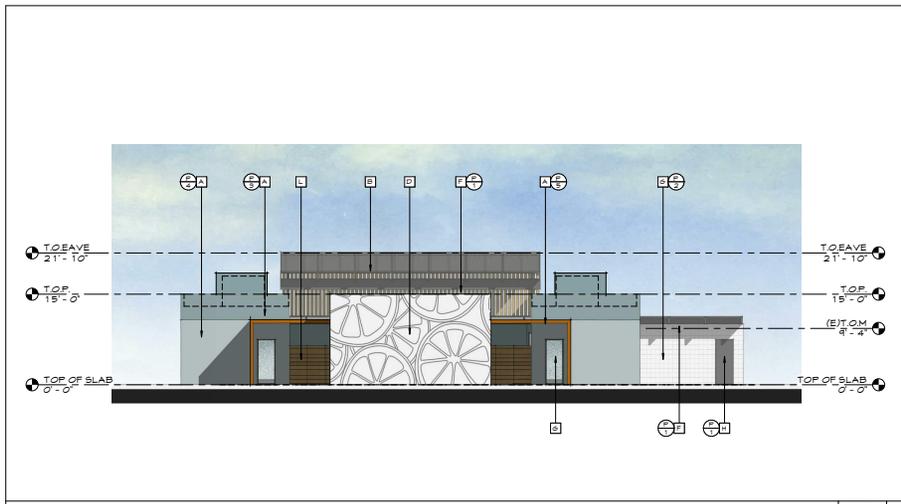


ADDED TEXTURE WITH PAINTED BLOCK

MATERIALS



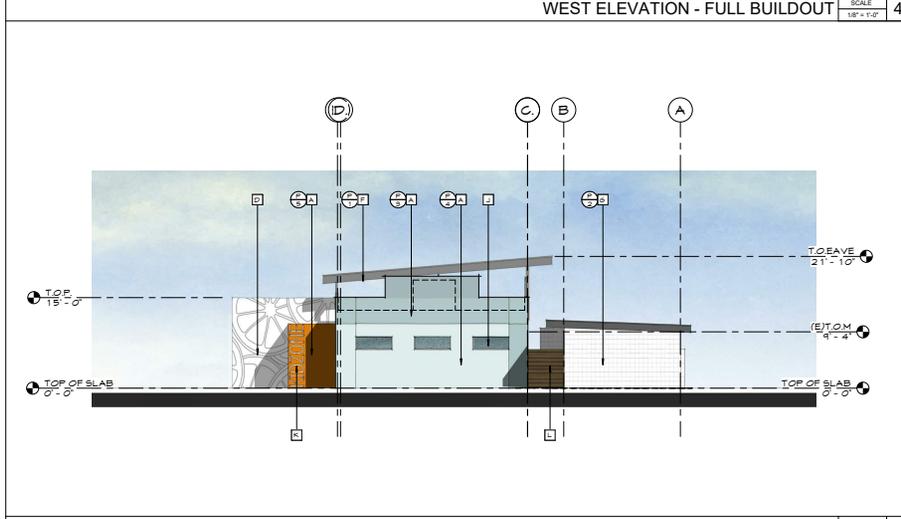
PAINTED DIRECTIONAL SIGNAGE



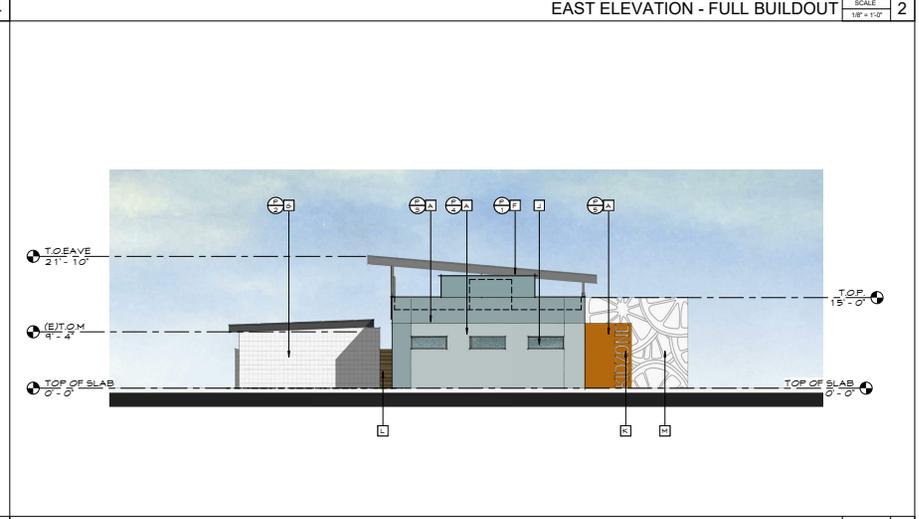
WEST ELEVATION - FULL BUILDOUT SCALE 1/8" = 1'-0" 4



EAST ELEVATION - FULL BUILDOUT SCALE 1/8" = 1'-0" 2

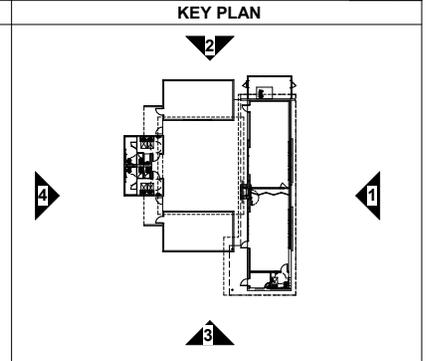


SOUTH ELEVATION - FULL BUILDOUT SCALE 1/8" = 1'-0" 3



NORTH ELEVATION - FULL BUILDOUT SCALE 1/8" = 1'-0" 1

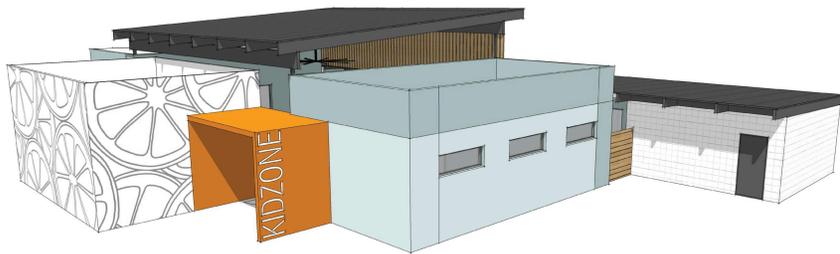
- EXTERIOR FINISHES**
- A SMOOTH TRONEL STUCCO FINISH
 - B STANDING SEAM METAL ROOF
 - C CLEAR ANODIZED ALUMINUM STOREFRONT DOOR
 - D PAINTED MURAL WALL
 - E STAINED AND SEALED VERTICAL CEDAR KD SHADE LOUVERS
 - F PAINTED WOOD ROOF FRAMING
 - G PAINTED EXISTING CMU BLOCK
 - H METAL DOOR AND FRAME
 - I EXTERIOR CEILING FAN
 - J CLEAR ANODIZED ALUMINUM STOREFRONT WINDOWS
 - K PROPOSED BUILDING SIGNAGE - APPROVED UNDER SEPERATE PERMIT PROCESS
 - L STAINED AND SEALED CEDAR WOOD FENCE
- PAINT**
- P-1: SPS1014 PEPPER CORN
 - P-2: SPS250 ISGLE
 - P-3: SPS1018 BREEZY
 - P-4: SPS140 ICEBERG
 - P-5: SPS0111 CORKY
 - P-6: SPS1015 KEB GRAY
- S-1: STAIN - SHERVIN WILLIAMS MNRXAX - HABITAT MK421



BUILDING B - CHILDREN'S



NORTHWEST VIEW



SOUTHWEST VIEW



SOUTHEAST VIEW



MURAL ART



COVERED PORCH WITH WOOD ACCENTS



FRESH MINT ACCENTS

ARCHITECTURAL STYLE & CHARACTER



CONTRASTING COLORS

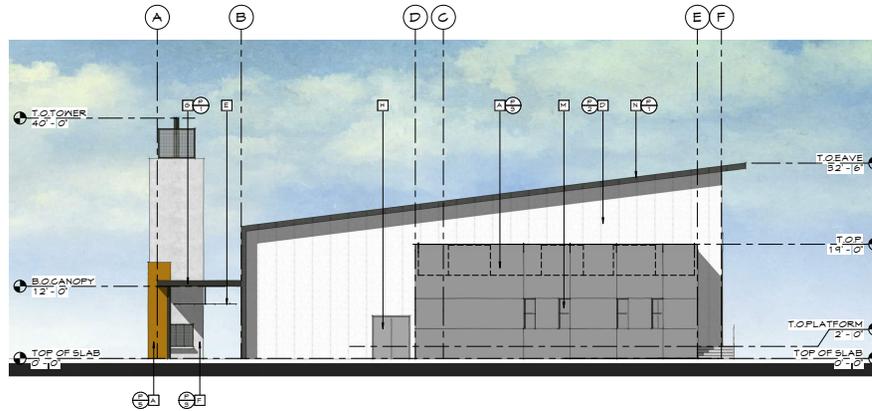


MURAL ART

MATERIALS



EAST ELEVATION - FULL BUILDOUT SCALE 1/8" = 1'-0" 2

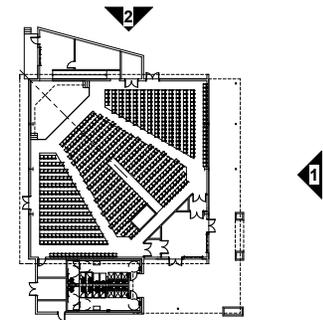


NORTH ELEVATION - FULL BUILDOUT SCALE 1/8" = 1'-0" 1

EXTERIOR FINISHES

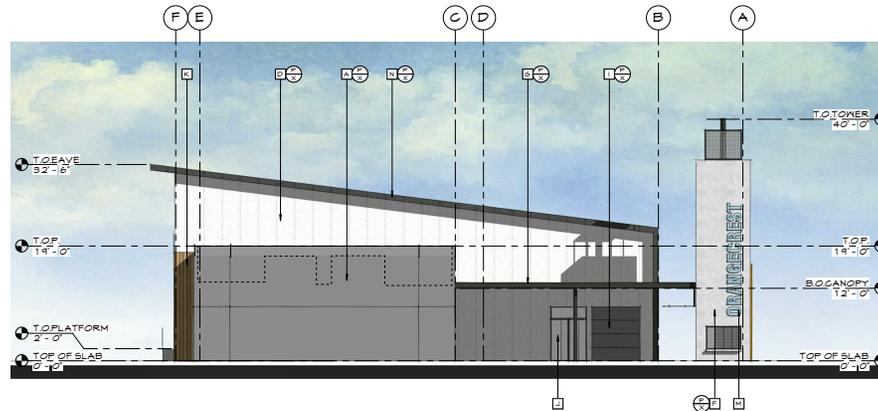
- A SMOOTH TROWEL STUCCO FINISH
 - B PRE-ENGINEERED METAL BUILDING PANELS - METAL FINISH
 - C PRE-ENGINEERED METAL ROOF PANELS - METAL FINISH
 - D PRE-ENGINEERED METAL BUILDING PANELS - STUCCO FINISH
 - E EXTERIOR CEILING FANS
 - F EXTERIOR DOUBLE-SIDED FIREPLACE WITH SMOOTH TROWEL STUCCO FINISH
 - G STEEL CANOPY
 - H METAL DOOR AND FRAME
 - I COIL ROLL UP DOOR
 - J CLEAR ANODIZED ALUMINUM STOREFRONT DOOR
 - K STAINED AND SEALED CEDAR WOOD SLATS
 - L PROPOSED WALL GRAPHIC APPROVED UNDER SEPERATE PERMIT PROCESS
 - M CLEAR ANODIZED ALUMINUM STOREFRONT WINDOW SYSTEM
 - N METAL FASCIA
 - O PRE-ENGINEERED METAL SOFFIT
 - P CONCRETE DOCK
- PAINT
 P-1: SW7614 PEPPER CORN
 P-2: SW6230 SIOLE
 P-3: SW7650 ELLE GRAY
 P-4:
 P-5: SW6511 CURRY
 P-6: SW1019 NEE GRAY
- S-1: STAIN - SHERKIN WILLIAMS MINNAX - HABITAT MIN21

KEY PLAN





WEST ELEVATION - FULL BUILDOUT SCALE 1/8"=1'-0" 4

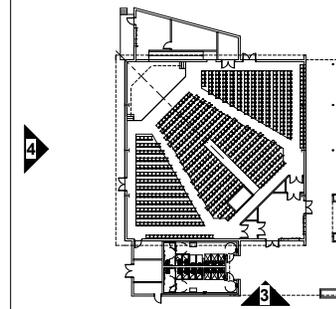


SOUTH ELEVATION - FULL BUILDOUT SCALE 1/8"=1'-0" 3

EXTERIOR FINISHES

- A SMOOTH TROWEL STUCCO FINISH
- B PRE-ENGINEERED METAL BUILDING PANELS - METAL FINISH
- C PRE-ENGINEERED METAL ROOF PANELS - METAL FINISH
- D PRE-ENGINEERED METAL BUILDING PANELS - STUCCO FINISH
- E EXTERIOR CEILING FANS
- F EXTERIOR DOUBLE-SIDED FIREPLACE WITH SMOOTH TROWEL STUCCO FINISH
- G STEEL CANOPY
- H METAL DOOR AND FRAME
- I COIL ROLL UP DOOR
- J CLEAR ANODIZED ALUMINUM STOREFRONT DOOR
- K STAINED AND SEALED CEDAR WOOD SLATS
- L PROPOSED WALL GRAPHIC APPROVED UNDER SEPERATE PERMIT PROCESS
- M CLEAR ANODIZED ALUMINUM STOREFRONT WINDOW SYSTEM
- N METAL FASCIA
- O PRE-ENGINEERED METAL SOFFIT
- P CONCRETE DOCK

KEY PLAN



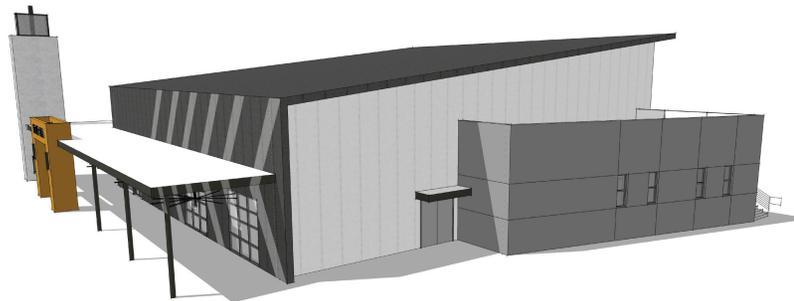
BUILDING C - WORSHIP



SOUTHEAST VIEW



SOUTHWEST VIEW



NORTHEAST VIEW

ARCHITECTURAL STYLE & CHARACTER



ANCHORED VERTICAL FORM



CONTRASTING COLORS



POP COLORS
WOOD ACCENTS

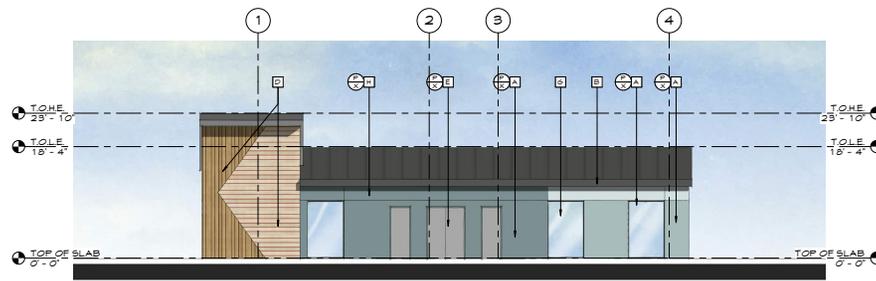


MID-CENTURY FORM

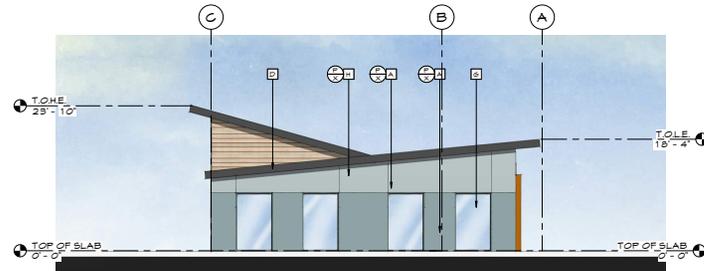


METAL ROOF TO WALL TRANSITION

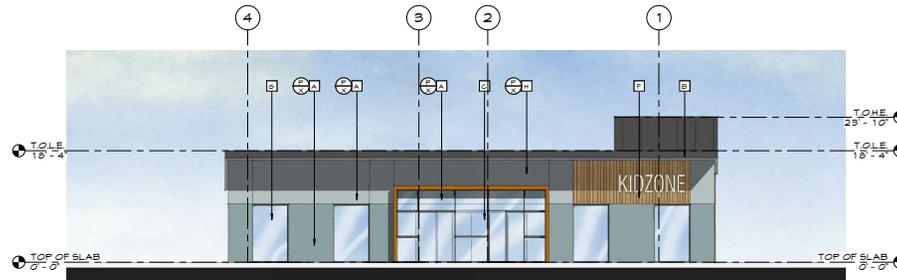
MATERIALS



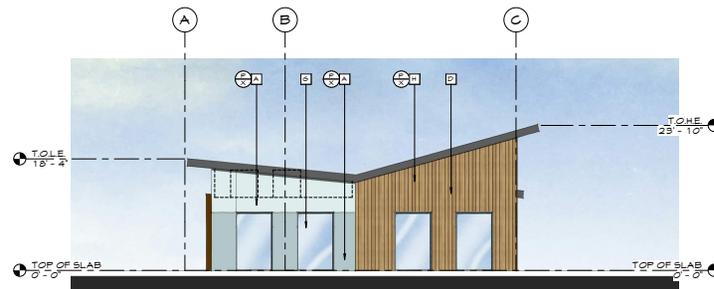
SOUTH ELEVATION SCALE 1/8" = 1'-0" 4



WEST ELEVATION SCALE 1/8" = 1'-0" 3



EAST ELEVATION SCALE 1/8" = 1'-0" 2

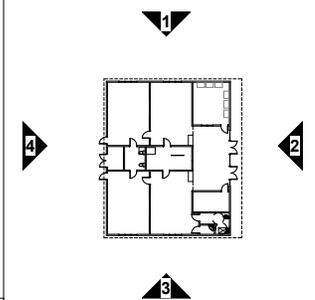


NORTH ELEVATION SCALE 1/8" = 1'-0" 1

EXTERIOR FINISHES

- A SMOOTH TROMEL STUCCO
- B STANDING SEAM METAL ROOF
- C CLEAR ANODIZED ALUMINUM STOREFRONT SYSTEM
- D STAINED AND SEALED CEDAR FLOOR SIDING
- E METAL DOOR AND FRAME
- F PROPOSED BUILDING SIGNAGE - APPROVED UNDER SEPERATE PERMIT PROCESS
- G CLEAR ANODIZED ALUMINUM STOREFRONT WINDOW AND FASCIA
- H

KEY PLAN



BUILDING D - NURSERY/PRESCHOOL



SOUTHEAST VIEW



NORTHEAST VIEW



NORTHWEST VIEW



MID CENTURY FORM



WOOD ACCENTS

MATERIALS

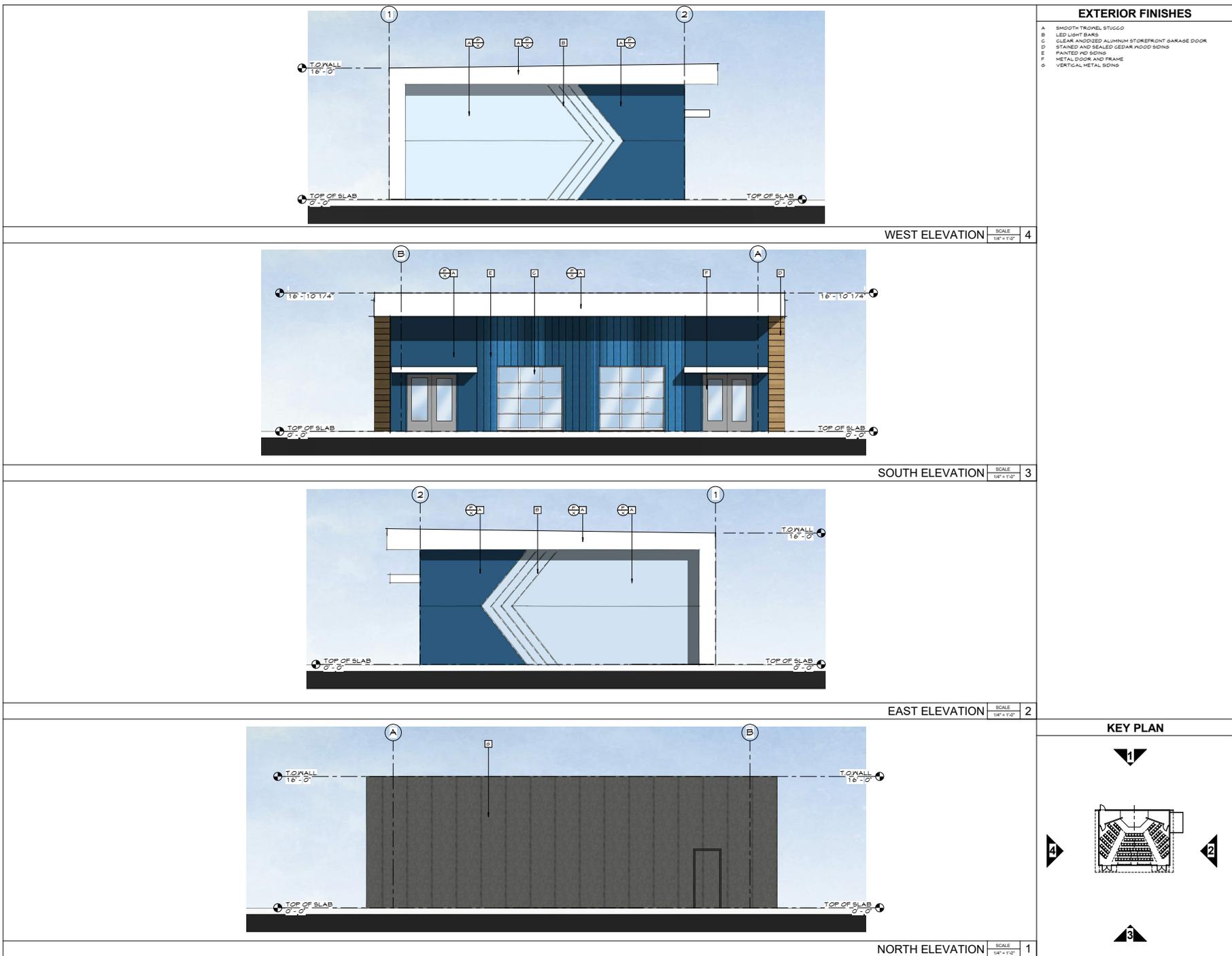
ARCHITECTURAL STYLE & CHARACTER



BOLD ACCENTS



FRESH MINT ACCENTS

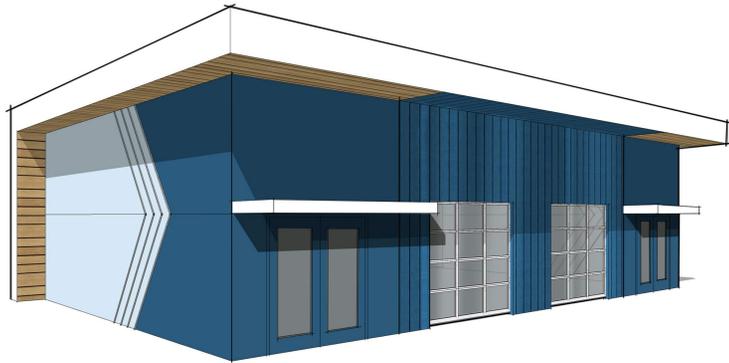


Source: Visioneering Studios Architecture

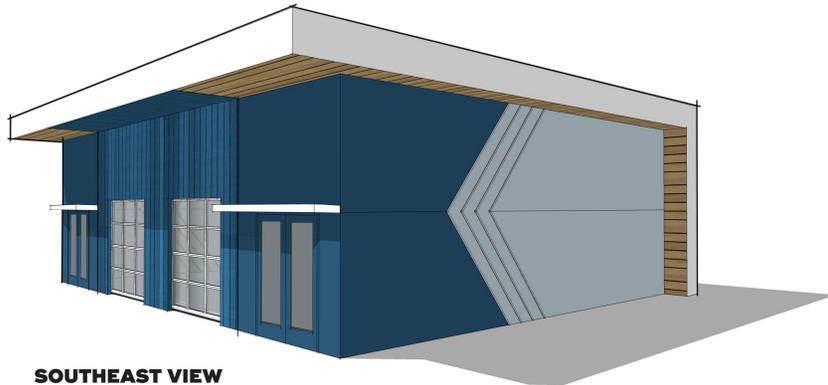
EXHIBIT 5j: Building "E" Color Elevations
Orangecrest Community Church

\\rvfp01\CA_RIV\1RIV_GIS\195272001- Orangecrest Church\5f Color Elevation.mxd

BUILDING E - YOUTH



SOUTHWEST VIEW



SOUTHEAST VIEW



SIMPLE & BOLD COLORS



**SIMPLE FORMS
NATURAL WOOD ACCENTS**

MATERIALS

ARCHITECTURAL STYLE & CHARACTER



PAINTED LAP SIDING



**LED STRIP
LIGHTING**

2. AGRICULTURE AND FORESTRY RESOURCES:				
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and the forest carbon measurement methodology provided in the Forest Protocols adopted by the California Air Resources Board. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2a. Response: (Source: General Plan 2025 – Figure OS-2 – Agricultural Suitability)				
No Impact. The Project is located in an urbanized area of the City in a residential portion of the City. The site was formerly used as a swim and tennis club. Additionally, the site is identified as urban/built-up land, as identified on Figure OS-2, and therefore does not support agricultural resources or operations. There are no agricultural resources or operations, including farmlands within proximity of the Project site. Therefore, the Project will have no impact directly, indirectly or cumulatively on agricultural uses.				
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2b. Response: (Source: General Plan 2025 – Figure OS-3 - Williamson Act Preserves, General Plan 2025 FPEIR – Figure 5.2-4 – Proposed Zones Permitting Agricultural Uses, and Title 19)				
No Impact. The site is within a built environment and no Williamson Act contracts are implemented on the site. A review of Figure 5.2-2 – Williamson Act Preserves of the General Plan 2025 FPEIR reveals that the Project site is not located within an area that is affected by a Williamson Act Preserve or under a Williamson Act Contract. The proposed Project will not conflict with existing zoning for agricultural uses or any applicable Williamson Act contracts. Therefore, no impacts will occur from this Project directly, indirectly or cumulatively.				
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined in Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2c. Response: (Source: General Plan 2025 Zoning Map for the City of Riverside)				
No Impact. Refer to Response 2a and 2b, above. The Project site and surroundings are currently zoned R-1-13000 Single Family Residential. The Project site is located in an urbanized area and is not zoned for forestland, timberland or timberland production. No additional changes would occur from Project implementation that would trigger or result in the rezoning of forest land or timberland. Therefore, no impacts will occur from this Project directly, indirectly or cumulatively.				
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2d. Response: (Source: General Plan 2025 Zoning Map for the City of Riverside)				
No Impact. As stated in 2c above, the Project site is currently zoned R-1-13000 Single Residential, is located in an urbanized area and is surrounded by existing development. Neither the site nor its surroundings are zoned for forestland, timberland or timberland production. Therefore, no impacts will occur.				

<p>e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>2e. Response: (Source: General Plan – Figure OS-2 – <i>Agricultural Suitability</i>, Figure OS-3 – <i>Williamson Act Preserves</i>)</p> <p>No Impact. The Project is located in an urbanized area of the City in an existing built-out residential zone. Additionally, the site is identified as urban/built out land and therefore does not support agricultural resources or operations. The Project will not result in the conversion of designated farmland to non-agricultural uses. In addition, there are no agricultural resources or operations, including farmlands within proximity of the subject site. The City of Riverside has no forest land that can support 10-percent native tree cover. Therefore, no impacts will occur from this Project directly, indirectly or cumulatively to the conversion of farmland, to non-agricultural use or to the loss of forest land.</p>				
<p>3. AIR QUALITY</p>				
<p>Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:</p>				
<p>a. Conflict with or obstruct implementation of the applicable air quality plan?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>3a. Response: (Source: <i>South Coast Air Quality Management District’s 2016 Air Quality Management Plan (AQMP); see Appendix A</i>)</p> <p>Less than Significant Impact. The City is located within the South Coast Air Basin (“the Basin”). The South Coast Air Quality Management District (SCAQMD) prepares the Air Quality Management Plan (AQMP) for the Basin. The AQMP sets forth a comprehensive program that will lead the Basin into compliance with all federal and state air quality standards. The AQMP’s control measures and related emission reduction estimates are based upon emissions projections for a future development scenario derived from land use, population, and employment characteristics defined in consultation with local governments. Accordingly, if a project demonstrates compliance with local land use plans and/or population projections, then the AQMP would have taken into account such uses when it was developed.</p> <p>The proposed Project includes construction and operation of a community church on a site previously used as a swim and tennis club. The site’s General Plan designation is low density residential and is zoned R-1-13000 Single Family Residential, requiring a CUP to develop the site as a place of worship. Although this use is not consistent with the General Plan 2025 land uses which were incorporated in the AQMP, the Project would generate less emissions than seventeen single-family units (the maximum number permitted under R-1-13000 for a 5.27-acre site). The GP 2025 FPEIR determined that implementation of the General Plan 2025 would generally meet attainment forecasts and attainment of the standards of the AQMP. Because the proposed Project would generate less emissions than what was approved under the 2016 AQMP, the Project would not conflict or obstruct implementation of the AQMP. Therefore, the Project would have less than significant impacts directly, indirectly, or cumulatively to the implementation of an air quality plan.</p>				
<p>b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>3b. Response: (Source: <i>General Plan 2025 FPEIR Table 5.3-B SCAQMD CEQA Regional Significance Thresholds, South Coast Air Quality Management District’s 2016 Air Quality Management Plan, CalEEMod version 2016.3.2, EMFAC 2017, and Air Quality Analysis prepared by Kimley-Horn, October 2020</i>)</p> <p>Less than Significant Impact. Per the GP 2025 FPEIR, AQMP thresholds indicate future construction activities under the General Plan are projected to result in significant levels of NO_x and ROG, both ozone precursors, and PM₁₀, PM_{2.5} and CO. The portion of the Basin within which the City is located is designated as a non-attainment area for ozone, PM₁₀ and PM_{2.5} under State standards, and as a non-attainment area for ozone, CO, PM₁₀, and PM_{2.5} under Federal standards.</p>				

The Project's short-term construction and long-term operational emissions were evaluated using the CalEEMod version 2016.3.2 computer program (refer to Appendix A – AQ/GHG Analysis to the Initial Study). Project construction will be subject to SCAQMD Rules 402 and 403 (prohibition of nuisances, watering of inactive and perimeter areas, track out requirements, etc.), and Rule 1113 for architectural coatings. Maximum daily emissions from Project construction are summarized below and compared to the SCAQMD's daily regional thresholds. The maximum emissions from Project operation are summarized in the subsequent tables and compared to the SCAQMD daily regional thresholds.

Table 3: Short-Term Construction Emissions

Activity	Maximum Pounds Per Day					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Construction Year 2021 (Including Phases 1 - 4)	5.58	40.55	38.48	0.08	9.28	5.80
SCAQMD Threshold	75	100	550	150	150	55
Exceed SCAQMD Threshold?	No	No	No	No	No	No

ROG = reactive organic gases, NO_x = nitrogen oxides, CO = carbon monoxide, SO₂ = sulfur dioxide, PM₁₀ = particulate matter 10 microns in diameter or less, PM_{2.5} = particulate matter 2.5 microns in diameter or less
Source: CalEEMod version 2016.3.2. Refer to Appendix A for model outputs of the Initial Study.

Table 4: Long-Term Operational Emissions

Source	Maximum Pounds Per Day					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Area Source Emissions	0.47	< 0.01	0.01	0.00	< 0.01	< 0.01
Energy Emissions	0.02	0.15	0.13	< 0.01	0.01	0.01
Mobile Emissions	0.37	1.20	3.30	0.01	0.91	0.26
Total Emissions	0.86	1.35	3.44	0.01	0.92	0.27
SCAQMD Threshold	55	55	550	150	55	150
Exceeds Threshold?	No	No	No	No	No	No

Source: CalEEMod version 2016.3.2. Refer to Appendix A for model outputs.
ROG = reactive organic gases, NO_x = nitrogen oxides, CO = carbon monoxide, SO₂ = sulfur dioxide, PM₁₀ = particulate matter 10 microns in diameter or less, PM_{2.5} = particulate matter 2.5 microns in diameter or less

The above Tables 3 and 4 compare the Project emissions (construction and operational) to the SCAQMD daily thresholds and shows that established thresholds would not be exceeded. Because the proposed Project is consistent with the General Plan 2025, cumulative impacts related to criteria pollutants as a result of the Project were previously evaluated as part of the cumulative analysis of build out anticipated under the General Plan 2025 Program. As a result, the proposed Project does not result in any new significant impacts that were not previously evaluated and for which a statement of overriding considerations was adopted as part of the General Plan 2025 FPEIR. Therefore, cumulative air quality emissions impacts are **less than significant**.

c. Expose sensitive receptors to substantial pollutant concentrations?

3c. Response: (Source: General Plan 2025 FPEIR Table 5.3-B SCAQMD CEQA Regional Significance Thresholds, South Coast Air Quality Management District's 2016 Air Quality Management Plan, CalEEMod version 2016.3.2 EMFAC 2017 Model and Air Quality Analysis prepared by Kimley-Horn, October 2020)

Less than Significant Impact. A significant impact may occur when a project would generate pollutant concentrations to a degree that would significantly affect sensitive receptors, which include populations that are more susceptible to the effects of air pollution than the population at large. Exposure of sensitive receptors is addressed for the following situations: criteria pollutants; CO hotspots; and toxic air contaminants (TACs, specifically diesel particulate matter [DPM]) from on-site construction.

Localized Significance Thresholds

The Localized Significance Threshold (LST) Methodology provides a look-up table for construction and operational emissions based on the emission rate, location, and distance from receptors, and provides a methodology for air

dispersion modeling to evaluate whether construction or operation could cause an exceedance of an ambient air quality standard. An LST analysis was performed for this Project to show that NO_x, CO, PM₁₀, PM_{2.5} emissions would not contribute to or cause an exceedance of California Ambient Air Quality Standards (CAAQS) or National Ambient Air Quality Standards (NAAQS). For determining localized air quality impacts from small projects in a defined geographic source receptor area (SRA), the LST methodology provides mass emission rate lookup tables for 1-acre, 2-acre, and 5-acre parcels by SRA.

The appropriate SRA for the City of Riverside is Metropolitan Riverside County (SRA 23). LSTs apply to CO, NO₂, PM₁₀, and PM_{2.5}. Project construction is anticipated to disturb a maximum of 3.5 acres in a single day based on estimated amount of construction equipment that may be needed and the SCAQMD guidance document Fact Sheet for Applying CalEEMod to LTS (SCAQMD 2017). As the LST mass look-up tables provide thresholds for projects disturbing 1-, 2-, and 5-acres in size and the thresholds increase with size of the site, the stricter threshold for 2 acres was used for construction analysis. For operational LSTs, although the Project site is slightly larger than five acres, the LST lookup tables can be used to show that even if the daily emissions from all Project operations were emitted on a five-acre site, the impacts would be less than significant

The SCAQMD's methodology states that "off-site mobile emissions from the Project should not be included in the emissions compared to LSTs." Therefore, only emissions included in the CalEEMod "on-site" emissions outputs were considered. The nearest sensitive receptors are the multi-family residences located 110 feet (34 meters) north of the Project. LST thresholds are provided in the mass look-up tables for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters. Therefore, LSTs for receptors located at a distance of 34 meters have been interpolated and utilized in this analysis. The **Table 5, Localized Significance of Construction Emissions** and **Table 6, Localized Significance of Operational Emissions**, below present the results of localized emissions during construction and operation, emissions of these pollutants would not result in significant concentrations of pollutants at nearby sensitive receptors.

Table 5: Localized Significance of Construction Emissions

Construction Activity	Maximum Pounds Per Day			
	NO _x	CO	PM ₁₀	PM _{2.5}
Demolition	31.44	21.57	1.99	1.51
Site Preparation	40.50	21.15	9.09	5.75
Grading	24.74	15.86	3.72	2.38
Construction ¹	17.43	16.58	0.96	0.90
Paving ¹	12.92	14.65	0.68	0.62
Architectural Coating ¹	1.53	1.82	0.09	0.09
SCAQMD Localized Screening Threshold (adjusted for 2 acres at 34 meters)	272	884	19	6
Exceed SCAQMD Threshold?	No	No	No	No

1: The building construction, paving, and architectural coating sub-phases are combined because they would potentially occur at the same time.
Source: CalEEMod version 2016.3.2. Refer to Appendix A for model outputs.

Table 6: Localized Significance of Operational Emissions

Construction Activity	Maximum Pounds Per Day			
	NO _x	CO	PM ₁₀	PM _{2.5}
On-Site and Mobile Source Emissions	1.35	3.44	0.92	0.27
SCAQMD Localized Screening Threshold (adjusted for 5 acres at 34 meters)	272	884	5	2
Exceed SCAQMD Threshold?	No	No	No	No

Note: 5-acre area, 34 meters to sensitive receptor, and conservatively includes 100% of mobile source emissions
Source: CalEEMod version 2016.3.2. Refer to Appendix A for model outputs.

As shown in Tables 5 and 6, above, the Project's construction and operational emissions would not exceed SCAQMD LSTs. Therefore, the Project would not result in significant localized construction or operational emissions.

Carbon Monoxide Hot-Spots

Projects involving traffic impacts may result in the formation of locally high concentrations of CO, known as CO "hot-spots." The Project is anticipated to generate a maximum of 138 average daily trips (ADT). An adverse CO concentration ("hot-spot") would occur if an exceedance of the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of nine ppm were to occur. At the time of the 1993 Handbook, the Basin was designated nonattainment under the NAAQS and CAAQS for CO. It has long been recognized that CO hot spots are caused by vehicular emissions, primarily when idling at congested intersections. However, vehicle emissions standards have become increasingly stringent in the last 20 years. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams per mile for passenger cars (there are requirements for certain vehicles that are more stringent). With the turnover of older vehicles, introduction of cleaner fuels and implementation of increasingly sophisticated and efficient emissions control technologies, CO concentration in the Basin is now designated as attainment.

Accordingly, with the steadily decreasing CO emissions from vehicles, even very busy intersections do not result in exceedances of the CO standard. An analysis prepared for CO attainment in the Basin by the SCAQMD can assist in evaluating the potential for CO exceedances. CO attainment was thoroughly analyzed as part of the SCAQMD's 2003 AQMP. As part of the SCAQMD CO hot-spot analysis, the Wilshire Boulevard/Veteran Avenue intersection, one of the most congested intersections in Southern California with an ADT volume of approximately 100,000 vehicles per day, was modeled for CO concentrations. This modeling effort identified a CO concentration high of 4.6 ppm, which is well below the 35-ppm Federal standard. The proposed Project considered herein would not produce the volume of traffic required to generate a CO hot-spot in the context of SCAQMD's 2003 CO hot-spot analysis. As the CO hot-spots were not experienced at the Wilshire Boulevard and Veteran Avenue intersection even as it accommodates 100,000 vehicles daily, it can be reasonably inferred that CO hot-spots would not be experienced at any vicinity intersections as a result of 138 additional vehicle trips attributable to the Project. Therefore, impacts would be less than significant in this regard.

Construction-Related Diesel Particulate Matter

Construction would result in the generation of DPM emissions from the use of off-road diesel equipment required. The amount to which the receptors are exposed (a function of concentration and duration of exposure) is the primary factor used to determine health risk (i.e., potential exposure to TAC emission levels that exceed applicable standards). Health-related risks associated with diesel-exhaust emissions are primarily linked to long-term exposure and the associated risk of contracting cancer.

The use of diesel-powered construction equipment would be temporary and episodic. The duration of exposure would be short and exhaust from construction equipment dissipates rapidly. Current models and methodologies for conducting health risk assessments are associated with longer-term exposure periods of nine, 30, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities.

California Office of Environmental Health Hazard Assessment has not identified short-term health effects from DPM. Construction is temporary and would be transient throughout the site (i.e., move from location to location) and would not generate emissions in a fixed location for extended periods of time. Construction would be subject to and would comply with California regulations limiting the idling of heavy-duty construction equipment to no more than five minutes to further reduce nearby sensitive receptors' exposure to temporary and variable DPM emissions. These regulations would further reduce nearby sensitive receptors' exposure to temporary and variable DPM emissions. Given the temporary and intermittent nature of construction activities likely to occur within specific locations in the Project site (i.e., construction is not likely to occur in any one location for an extended time), the dose of DPM of any one receptor is exposed to would be limited. Therefore, considering the relatively short duration of DPM-emitting construction activity at any one location and the highly dispersive properties of DPM, sensitive receptors would not be exposed to substantial concentrations of construction-related TAC emissions. Carcinogenic health risk occurs from long-term exposure and not necessarily construction activities. For these reasons, DPM generated by construction activities, in and of itself, would not be expected to expose sensitive receptors to substantial amounts of air toxics and the Project would have a less than significant impact.

As discussed, short-term construction and long-term operations would not result in the generation of significant criteria pollutants, CO hot-spots, and TACs (specifically DPM). Therefore, the Project would not expose sensitive receptors to substantial pollutant concentrations and a **less than significant impact** will occur directly, indirectly or cumulatively for this Project.

d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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3d. Response: (Source: Air Quality Analysis prepared by Kimley-Horn, October 20202)

No Impact. The Project would not expose a substantial number of people to objectionable odors because no odors are anticipated to be generated by the proposed use. Therefore, **no impact** to creating objectionable odors will occur directly, indirectly or cumulatively.

4. BIOLOGICAL RESOURCES

Would the project:

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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4a. Response: (Source: Biological Resources Assessment, Jurisdictional Delineation, Burrowing Owl Habitat Assessment, Riverine/Riparian and Vernal Pool Assessment, prepared by Jericho Systems on October 1, 2020; see Appendix B)

Less than Significant Impact with Mitigation Incorporated. Prior to the field investigation reference materials and databases relevant to the Project site were reviewed for the Riverside East and Riverside West 7.5-minute USGS quadrangles. The database search included the Riverside West USGS Quad due to the Project site’s proximity (less than 3 miles). The sources reviewed included:

- California Natural Diversity Database (CNDDDB) Rarefind 5;
- CNDDDB Biogeographic Information and Observation System (BIOS);
- U.S. Department of Agriculture Natural Resources Conservation Service (NRCS) Web Soil Survey;
- County/City habitat conservation plans and other sensitive resource policies;
- RCA MSHCP Information Map; and
- Burrowing Owl Burrow Reconnaissance Survey prepared by FirstCarbon Solutions in 2015

A habitat assessment was prepared on August 24, 2020, by Jericho Systems qualified biologist Christian Nordal. Mr. Nordal is a biologist with an M.S. in biology and several years of experience surveying for Burrowing Owl (BUOW) in Southern California. Mr. Nordal conducted the BUOW habitat suitability assessment conducted in accordance with the MSHCP, which follows the 1993 “Burrowing Owl Survey Protocol and Mitigation Guidelines” prepared by the California Burrowing Owl Consortium. Suitable habitat was determined present, and this protocol requires four surveys between March 1 - August 31. The surveys conducted are shown below under **Table 7, Weather Data During Survey.**

Table 7: Weather Data During Survey

Date	Time of Survey	% Cloud Cover	Wind (BFT)	Temperature (° F)	Precipitation
08/24/2020	8:00 a.m.	0	0	74	None
08/26/2020	6:00 p.m.	0	0	100	None
08/27/2020	8:00 a.m.	0	1	70	None
08/29/2020	6:00 p.m.	0	1	85	None

According to the database searches, 60 sensitive species and four sensitive habitats have been documented in the Riverside East and Riverside West USGS 7.5-minute series quadrangles; refer to **Table 8, Sensitive Species Potential to Occur**.

Table 8: Sensitive Species Potential to Occur

Scientific Name	Common Name	Federal Listing State Listing Other Listing	Habitats	Potential To Occur
Plants				
<i>Abronia villosa</i> var. <i>aurita</i>	chaparral sand-verbena	None None G5T2? S2 1B.1 BLM: Sensitive USFS: Sensitive	Chaparral, coastal scrub, desert dunes. Sandy areas. -60-1570 m.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
<i>Ambrosia pumila</i>	San Diego ambrosia	Endangered None G1 S1 1B.1	Chaparral, coastal scrub, valley and foothill grassland. Sandy loam or clay soil; sometimes alkaline. In valleys; persists where disturbance has been superficial. Sometimes on margins or near vernal pools. 3-580 m.	The soils required for this species are not on site. Potential to occur is low .
<i>Arenaria paludicola</i>	marsh sandwort	Endangered Endangered G1 S1 1B.1	Marshes and swamps. Growing up through dense mats of Typha, Juncus, Scirpus, etc. in freshwater marsh. Sandy soil. 3-170 m.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
<i>Berberis nevini</i>	Nevin's barberry	Endangered Endangered G1 S1 1B.1	Chaparral, cismontane woodland, coastal scrub, riparian scrub. On steep, N-facing slopes or in low grade sandy washes. 90-1590 m.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
<i>Calochortus plummerae</i>	Plummer's mariposa-lily	None None G4 S4 4.2	Coastal scrub, chaparral, valley and foothill grassland, cismontane woodland, lower montane coniferous forest. Occurs on rocky and sandy sites, usually of granitic or alluvial material. Can be very common after fire. 60-2500 m.	Habitat on site is ruderal annual grassland with some remnant coastal scrub species. Potential to occur is moderate .
<i>Centromadia pungens</i> ssp. <i>laevis</i>	smooth tarplant	None None G3G4T2 S2 1B.1	Valley and foothill grassland, chenopod scrub, meadows and seeps, playas, riparian woodland. Alkali meadow, alkali scrub; also in disturbed places. 5-1170 m.	Habitat on site is ruderal annual grassland with some remnant coastal scrub species. Potential to occur is moderate .
<i>Chloropyron maritimum</i> ssp. <i>maritimum</i>	salt marsh bird's-beak	Endangered Endangered G4?T1 S1 1B.2 BLM: Sensitive	Marshes and swamps, coastal dunes. Limited to the higher zones of salt marsh habitat. 0-10 m.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
<i>Chorizanthe parryi</i> var. <i>parryi</i>	Parry's spineflower	None None G3T2 S2 1B.1 BLM: Sensitive USFS: Sensitive	Coastal scrub, chaparral, cismontane woodland, valley and foothill grassland. Dry slopes and flats; sometimes at interface of 2 vegetation types, such as chaparral and oak woodland. Dry, sandy soils. 90-1220 m.	Habitat on site is ruderal annual grassland with some remnant coastal scrub species. Potential to occur is moderate .
<i>Cylindropuntia californica</i> var. <i>californica</i>	snake cholla	None None G3T2 S1 1B.1 BLM: Sensitive	Chaparral, coastal scrub. 15-290 m.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
<i>Deinandra paniculata</i>	paniculate tarplant	None None G4 S4 4.2	Coastal scrub, valley and foothill grassland, vernal pools. Usually in vernal mesic sites. Sometimes in vernal pools or on mima mounds near them. 25-940 m.	Habitat on site is ruderal annual grassland with some remnant coastal scrub species. Potential to occur is moderate .

Scientific Name	Common Name	Federal Listing State Listing Other Listing	Habitats	Potential To Occur
<i>Eriastrum densifolium</i> ssp. <i>sanctorum</i>	Santa Ana River woollystar	Endangered Endangered G4T1 S1 1B.1	Coastal scrub, chaparral. In sandy soils on river floodplains or terraced fluvial deposits. 180-705 m.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
<i>Lasthenia glabrata</i> ssp. <i>coulteri</i>	Coulter's goldfields	None None G4T2 S2 1B.1 BLM: Sensitive	Coastal salt marshes, playas, vernal pools. Usually found on alkaline soils in playas, sinks, and grasslands. 1-1375 m.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
<i>Lepidium virginicum</i> var. <i>robinsonii</i>	Robinson's pepper-grass	None None G5T3 S3 4.3	Chaparral, coastal scrub. Dry soils, shrubland. 4-1435 m.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
<i>Myosurus minimus</i> ssp. <i>apus</i>	little mousetail	None None G5T2Q S2 3.1	Vernal pools, valley and foothill grassland. Alkaline soils. 20-640 m.	Vernal pools are not on site. Potential to occur is low .
<i>Phacelia stellaris</i>	Brand's star phacelia	None None G1 S1 1B.1	Coastal scrub, coastal dunes. Open areas. 3-370 m.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
<i>Romneya coulteri</i>	Coulter's matilija poppy	None None G4 S4 4.2	Coastal scrub, chaparral. In washes and on slopes; also after burns. 20-1200 m.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
<i>Senecio aphanactis</i>	chaparral ragwort	None None G3 S2 2B.2	Chaparral, cismontane woodland, coastal scrub. Drying alkaline flats. 20-1020 m.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
Birds				
<i>Accipiter cooperii</i>	Cooper's hawk	None None G5 S4 CDFW: Watch List IUCN: Least Concern	Woodland, chiefly of open, interrupted or marginal type. Nest sites mainly in riparian growths of deciduous trees, as in canyon bottoms on river flood-plains; also, live oaks.	There are ornamental trees in the vicinity that can provide suitable habitat for this species. Potential to occur is moderate .
<i>Agelaius tricolor</i>	tricolored blackbird	None Threatened G2G3 S1S2 BLM: Sensitive CDFW: Species of Special Concern IUCN: Endangered NABCI: Red Watch List USFWS: Birds of Conservation Concern	Highly colonial species, most numerous in Central Valley & vicinity. Largely endemic to California. Requires open water, protected nesting substrate, and foraging area with insect prey within a few km of the colony.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
<i>Aimophila ruficeps canescens</i>	southern California rufous-crowned sparrow	None None G5T3 S3 CDFW: Watch List	Resident in Southern California coastal sage scrub and sparse mixed chaparral. Frequents relatively steep, often rocky hillsides with grass and forb patches.	Steep, rocky cliffside preferred by this species is on site, and some coastal scrub species occur on and near the cliff. Potential to occur is moderate .

Scientific Name	Common Name	Federal Listing State Listing Other Listing	Habitats	Potential To Occur
<i>Artemisiospiza belli belli</i>	Bell's sage sparrow	None None G5T2T3 S3 CDFW: Watch List USFWS: Birds of Conservation Concern	Nests in chaparral dominated by fairly dense stands of chamise. Found in coastal sage scrub in south of range. Nest located on the ground beneath a shrub or in a shrub 6-18 inches above ground. Territories about 50 yds apart.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
<i>Athene cunicularia</i>	burrowing owl	None None G4 S3 BLM: Sensitive CDFW: Species of Special Concern IUCN: Least Concern USFWS: Birds of Conservation Concern	Open, dry annual or perennial grasslands, deserts, and scrublands characterized by low-growing vegetation. Subterranean nester, dependent upon burrowing mammals, most notably, the California ground squirrel.	Some suitable habitat for this species occurs at the southern base of the cliff. Potential to occur is moderate .
<i>Buteo swainsoni</i>	Swainson's hawk	None Threatened G5 S3 BLM: Sensitive IUCN: Least Concern USFWS: Birds of Conservation Concern	Breeds in grasslands with scattered trees, juniper-sage flats, riparian areas, savannahs, & agricultural or ranch lands with groves or lines of trees. Requires adjacent suitable foraging areas such as grasslands, or alfalfa or grain fields supporting rodent populations.	The project is outside of the species' current known range. Potential to occur is low .
<i>Coccyzus americanus occidentalis</i>	western yellow-billed cuckoo	Threatened Endangered G5T2T3 S1 BLM: Sensitive NABCI: Red Watch List USFS: Sensitive USFWS: Birds of Conservation Concern	Riparian forest nester, along the broad, lower flood-bottoms of larger river systems. Nests in riparian jungles of willow, often mixed with cottonwoods, with lower story of blackberry, nettles, or wild grape.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
<i>Coturnicops noveboracensis</i>	yellow rail	None None G4 S1S2 CDFW: Species of Special Concern IUCN: Least Concern NABCI: Red Watch List USFS: Sensitive USFWS: Birds of Conservation Concern	Summer resident in eastern Sierra Nevada in Mono County. Freshwater marshlands.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
<i>Eremophila alpestris actia</i>	California horned lark	None None G5T4Q S4 CDFW: Watch List IUCN: Least Concern	Coastal regions, chiefly from Sonoma County to San Diego County. Also main part of San Joaquin Valley and east to foothills. Short-grass prairie, "bald" hills, mountain meadows, open coastal plains, fallow grain fields, alkali flats.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
<i>Icteria virens</i>	yellow-breasted chat	None None G5 S3	Summer resident; inhabits riparian thickets of willow and other brushy tangles near watercourses.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .

			CDFW: Species of Special Concern IUCN: Least Concern	Nests in low, dense riparian, consisting of willow, blackberry, wild grape; forages and nests within 10 ft of ground.	
<i>Lanius ludovicianus</i>	loggerhead shrike		None None G4 S4 CDFW: Species of Special Concern IUCN: Least Concern USFWS: Birds of Conservation Concern	Broken woodlands, savannah, pinyon-juniper, Joshua tree, and riparian woodlands, desert oases, scrub & washes. Prefers open country for hunting, with perches for scanning, and fairly dense shrubs and brush for nesting.	Habitat on site is non-expansive/open ruderal annual grassland and is not suitable for this species. Potential to occur is low .
<i>Laterallus jamaicensis coturniculus</i>	California black rail		None Threatened G3G4T1 S1 BLM: Sensitive CDFW: Fully Protected IUCN: Near Threatened NABCI: Red Watch List USFWS: Birds of Conservation Concern	Inhabits freshwater marshes, wet meadows and shallow margins of saltwater marshes bordering larger bays. Needs water depths of about 1 inch that do not fluctuate during the year and dense vegetation for nesting habitat.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
<i>Polioptila californica californica</i>	coastal California gnatcatcher		Threatened None G4G5T2Q S2 CDFW: Species of Special Concern NABCI: Yellow Watch List	Obligate, permanent resident of coastal sage scrub below 2,500 ft in Southern California. Low, coastal sage scrub in arid washes, on mesas and slopes. Not all areas classified as coastal sage scrub are occupied.	Habitat on site is primarily ruderal annual grassland and coastal scrub on site does not contain <i>Artemesia californica</i> , the plant preferred by this species for nesting. The scrub is not suitable for this species. Potential to occur is low .
<i>Setophaga petechia</i>	yellow warbler		None None G5 S3S4 CDFW: Species of Special Concern USFWS: Birds of Conservation Concern	Riparian plant associations in close proximity to water. Also nests in montane shrubbery in open conifer forests in Cascades and Sierra Nevada. Frequently found nesting and foraging in willow shrubs and thickets, and in other riparian plants including cottonwoods, sycamores, ash, and alders.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
<i>Spinus lawrencei</i>	Lawrence's goldfinch		None None G3G4 S3S4 IUCN: Least Concern NABCI: Yellow Watch List USFWS: Birds of Conservation Concern	Nests in open oak or other arid woodland and chaparral, near water. Nearby herbaceous habitats used for feeding. Closely associated with oaks.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
<i>Vireo bellii pusillus</i>	least Bell's vireo		Endangered Endangered G5T2 S2 IUCN: Near Threatened NABCI: Yellow Watch List	Summer resident of Southern California in low riparian in vicinity of water or in dry river bottoms; below 2000 ft. Nests placed along margins of bushes or on twigs projecting into pathways, usually willow, <i>Baccharis</i> , mesquite.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .

Scientific Name	Common Name	Federal Listing State Listing Other Listing	Habitats	Potential To Occur
Mammals				
<i>Chaetodipus fallax fallax</i>	northwestern San Diego pocket mouse	None None G5T3T4 S3S4 CDFW: Species of Special Concern	Coastal scrub, chaparral, grasslands, sagebrush, etc. in western San Diego County. Sandy, herbaceous areas, usually in association with rocks or coarse gravel.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
<i>Dipodomys merriami parvus</i>	San Bernardino kangaroo rat	Endangered Candidate Endangered G5T1 S1 CDFW: Species of Special Concern	Alluvial scrub vegetation on sandy loam substrates characteristic of alluvial fans and flood plains. Needs early to intermediate seral stages.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
<i>Dipodomys stephensi</i>	Stephens' kangaroo rat	Endangered Threatened G2 S2 IUCN: Endangered	Primarily annual & perennial grasslands, but also occurs in coastal scrub & sagebrush with sparse canopy cover. Prefers buckwheat, chamise, brome grass and filaree. Will burrow into firm soil.	Habitat on site is marginally suitable for this species. Potential to occur is moderate .
<i>Eumops perotis californicus</i>	western mastiff bat	None None G5T4 S3S4 BLM: Sensitive CDFW: Species of Special Concern WBWG: High Priority	Many open, semi-arid to arid habitats, including conifer & deciduous woodlands, coastal scrub, grasslands, chaparral, etc. Roosts in crevices in cliff faces, high buildings, trees and tunnels.	The cliff face provides suitable roosting habitat for this species. Potential to occur is moderate .
<i>Lasiurus xanthinus</i>	western yellow bat	None None G5 S3 CDFW: Species of Special Concern IUCN: Least Concern WBWG: High Priority	Found in valley foothill riparian, desert riparian, desert wash, and palm oasis habitats. Roosts in trees, particularly palms. Forages over water and among trees.	Palm trees suitable for roosting are on site and water sources are available within a mile radius. Potential to occur is moderate .
<i>Lepus californicus bennettii</i>	San Diego black-tailed jackrabbit	None None G5T3T4 S3S4 CDFW: Species of Special Concern	Intermediate canopy stages of shrub habitats & open shrub / herbaceous & tree / herbaceous edges. Coastal sage scrub habitats in Southern California.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
<i>Nyctinomops femorosaccus</i>	pocketed free-tailed bat	None None G4 S3 CDFW: Species of Special Concern IUCN: Least Concern WBWG: Medium Priority	Variety of arid areas in Southern California; pine-juniper woodlands, desert scrub, palm oasis, desert wash, desert riparian, etc. Rocky areas with high cliffs.	The cliff face provides suitable roosting habitat for this species. Potential to occur is moderate .
<i>Onychomys torridus ramona</i>	southern grasshopper mouse	None None G5T3 S3 CDFW: Species of Special Concern	Chenopod scrub Desert areas, especially scrub habitats with friable soils for digging. Prefers low to moderate shrub cover. Feeds almost exclusively on arthropods, especially scorpions and orthopteran insects.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
<i>Perognathus longimembris brevinasus</i>	Los Angeles pocket mouse	None None G5T1T2	Coastal scrub	Habitat on site is primarily ruderal annual grassland and

		S1S2 CDFW: Species of Special Concern	Lower elevation grasslands and coastal sage communities in and around the Los Angeles Basin. Open ground with fine, sandy soils. May not dig extensive burrows, hiding under weeds and dead leaves instead.	is not suitable for this species. Potential to occur is low .
<i>Taxidea taxus</i>	American badger	None None G5 S3 CDFW: Species of Special Concern IUCN: Least Concern	Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils. Needs sufficient food, friable soils and open, uncultivated ground. Preys on burrowing rodents. Digs burrows.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
Reptiles				
<i>Anniella stebbinsi</i>	Southern California legless lizard	None None G3 S3 CDFW: Species of Special Concern USFS: Sensitive	Generally south of the Transverse Range, extending to northwestern Baja California. Occurs in sandy or loose loamy soils under sparse vegetation. Disjunct populations in the Tehachapi and Piute Mountains in Kern County. Variety of habitats; generally in moist, loose soil. They prefer soils with a high moisture content.	Suitable habitat for this species occurs at the base of the cliff where less drought-tolerant species occur. Potential to occur is moderate .
<i>Arizona elegans occidentalis</i>	California glossy snake	None None G5T2 S2 CDFW: Species of Special Concern	Patchily distributed from the eastern portion of San Francisco Bay, southern San Joaquin Valley, and the Coast, Transverse, and Peninsular ranges, south to Baja California. Generalist reported from a range of scrub and grassland habitats, often with loose or sandy soils.	Suitable habitat for this species occurs at the base of the cliff where less drought-tolerant species occur. Potential to occur is moderate .
<i>Aspidoscelis hyperythra</i>	orange-throated whiptail	None None G5 S2S3 CDFW: Watch List IUCN: Least Concern USFS: Sensitive	Inhabits low-elevation coastal scrub, chaparral, and valley-foothill hardwood habitats. Prefers washes and other sandy areas with patches of brush and rocks. Perennial plants necessary for its major food: termites.	Washes are not on site. Potential to occur is low .
<i>Aspidoscelis tigris stejnegeri</i>	coastal whiptail	None None G5T5 S3 CDFW: Species of Special Concern	Found in deserts and semi-arid areas with sparse vegetation and open areas. Also found in woodland & riparian areas. Ground may be firm soil, sandy, or rocky.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
<i>Crotalus ruber</i>	red-diamond rattlesnake	None None G4 S3 CDFW: Species of Special Concern USFS: Sensitive	Chaparral, woodland, grassland, & desert areas from coastal San Diego County to the eastern slopes of the mountains. Occurs in rocky areas and dense vegetation. Needs rodent burrows, cracks in rocks or surface cover objects.	Habitat on site is primarily ruderal annual grassland. Potential to occur is moderate .
<i>Phrynosoma blainvillii</i>	coast horned lizard	None None G3G4 S3S4 BLM: Sensitive CDFW: Species of Special Concern IUCN: Least Concern	Frequents a wide variety of habitats, most common in lowlands along sandy washes with scattered low bushes. Open areas for sunning, bushes for cover, patches of loose soil for burial, and abundant supply of ants and other insects.	Habitat on site is primarily ruderal annual grassland and is not suitable for this species. Potential to occur is low .
Amphibians				
<i>Spea hammondi</i>	western spadefoot	None None G3 S3	Occurs primarily in grassland habitats, but can be found in valley-foothill hardwood woodlands.	Habitat on site is primarily ruderal annual grassland with no pooling areas and is not

		BLM: Sensitive CDFW: Species of Special Concern IUCN: Near Threatened	Vernal pools are essential for breeding and egg-laying.	suitable for this species. Potential to occur is low .
Fish				
<i>Catostomus santaanae</i>	Santa Ana sucker	Threatened None G1 S1 AFS: Threatened IUCN: Vulnerable	Endemic to Los Angeles Basin south coastal streams. Habitat generalists, but prefer sand-rubble-boulder bottoms, cool, clear water, and algae.	Habitat on site is not aquatic. Potential to occur is none .
<i>Gila orcuttii</i>	arroyo chub	None None G2 S2 AFS: Vulnerable CDFW: Species of Special Concern USFS: Sensitive	Native to streams from Malibu Creek to San Luis Rey River basin. Introduced into streams in Santa Clara, Ventura, Santa Ynez, Mojave & San Diego river basins. Slow water stream sections with mud or sand bottoms. Feeds heavily on aquatic vegetation and associated invertebrates.	Habitat on site is not aquatic. Potential to occur is none .
<i>Oncorhynchus mykiss irideus pop. 10</i>	steelhead - southern California DPS	Endangered None G5T1Q S1 AFS: Endangered	Federal listing refers to populations from Santa Maria River south to southern extent of range (San Mateo Creek in San Diego County). Southern steelhead likely have greater physiological tolerances to warmer water and more variable conditions.	Habitat on site is not aquatic. Potential to occur is none .
<i>Rhinichthys osculus ssp. 3</i>	Santa Ana speckled dace	None None G5T1 S1 AFS: Threatened CDFW: Species of Special Concern USFS: Sensitive	Headwaters of the Santa Ana and San Gabriel rivers. May be extirpated from the Los Angeles River system. Requires permanent flowing streams with summer water temps of 17-20 C. Usually inhabits shallow cobble and gravel riffles.	Habitat on site is not aquatic. Potential to occur is none .
Crustaceans				
<i>Streptocephalus woottoni</i>	Riverside fairy shrimp	Endangered None G1G2 S1S2 IUCN: Endangered	Endemic to Western Riverside, Orange, and San Diego counties in areas of tectonic swales/earth slump basins in grassland and coastal sage scrub. Inhabit seasonally astatic pools filled by winter/spring rains. Hatch in warm water later in the season.	There are no vernal pools on site. Potential to occur is low .
Insects				
<i>Bombus crotchii</i>	Crotch bumble bee	None Candidate Endangered G3G4 S1S2	Coastal California east to the Sierra-Cascade crest and south into Mexico. Food plant genera include <i>Antirrhinum</i> , <i>Phacelia</i> , <i>Clarkia</i> , <i>Dendromecon</i> , <i>Eschscholzia</i> , and <i>Eriogonum</i> .	Habitat on site is primarily disturbed and buckwheat is sparse. Potential to occur is low .
<i>Carolella busckana</i>	Busck's gallmoth	None None G1G3 SH	Coastal dunes, Coastal scrub	Coastal dunes habitat does not occur on site. Potential to occur is low .
<i>Ceratochrysis longimala</i>	Desert cuckoo wasp	None None G1 S1	Desert habitats.	Desert habitat is not on site. Potential to occur is low .
<i>Euphydryas editha quino</i>	quino checkerspot butterfly	Endangered None G5T1T2 S1S2	Sunny openings within chaparral & coastal sage shrublands in parts of Riverside & San Diego counties. Hills and mesas near the coast. Need high densities of food plants <i>Plantago erecta</i> , <i>P. insularis</i> , and <i>Orthocarpus purpureus</i> .	<i>Plantago</i> species required by this species do not occur on site. Potential to occur is low .
<i>Neolarra alba</i>	white cuckoo bee	None None GH	Known only from localities in Southern California.	The host bees for this species occur primarily in desert

		SH	Cleptoparasitic in the nests of perdita bees.	areas. Potential to occur is low .
Habitats				
<i>Southern California Arroyo Chub/Santa Ana Sucker Stream</i>	Southern California Arroyo Chub/Santa Ana Sucker Stream	None None GNR SNR	N/A	Habitat is not on site.
<i>Southern Cottonwood Willow Riparian Forest</i>	Southern Cottonwood Willow Riparian Forest	None None G3 S3.2	N/A	Habitat is not on site.
<i>Southern Sycamore Alder Riparian Woodland</i>	Southern Sycamore Alder Riparian Woodland	None None G4 S4	N/A	Habitat is not on site.
<i>Southern Willow Scrub</i>	Southern Willow Scrub	None None G3 S2.1	N/A	Habitat is not on site.
Coding and Terms				
<p>E = Endangered T = Threatened C = Candidate FP = Fully Protected SSC = Species of Special Concern R = Rare</p> <p>State Species of Special Concern: An administrative designation given to vertebrate species that appear to be vulnerable to extinction because of declining populations, limited acreages, and/or continuing threats. Raptor and owls are protected under section 3502.5 of the California Fish and Game code: "It is unlawful to take, possess or destroy any birds in the orders Falconiformes or Strigiformes or to take, possess or destroy the nest or eggs of any such bird."</p> <p>State Fully Protected: The classification of Fully Protected was the State's initial effort in the 1960's to identify and provide additional protection to those animals that were rare or faced possible extinction. Lists were created for fish, mammals, amphibians and reptiles. Fully Protected species may not be taken or possessed at any time and no licenses or permits may be issued for their take except for collecting these species for necessary scientific research and relocation of the bird species for the protection of livestock.</p>				
<p>Global Rankings (Species or Natural Community Level): G1 = Critically Imperiled – At very high risk of extinction due to extreme rarity (often 5 or fewer populations), very steep declines, or other factors. G2 = Imperiled – At high risk of extinction due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors. G3 = Vulnerable – At moderate risk of extinction due to a restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors. G4 = Apparently Secure – Uncommon but not rare; some cause for long-term concern due to declines or other factors. G5 = Secure – Common; widespread and abundant.</p> <p>Subspecies Level: Taxa which are subspecies or varieties receive a taxon rank (T-rank) attached to their G-rank. Where the G-rank reflects the condition of the entire species, the T-rank reflects the global situation of just the subspecies. For example: the Point Reyes mountain beaver, <i>Aplodontia rufa</i> ssp. <i>phaea</i> is ranked G5T2. The G-rank refers to the whole species range, i.e., <i>Aplodontia rufa</i>. The T-rank refers only to the global condition of ssp. <i>phaea</i>.</p> <p>State Ranking: S1 = Critically Imperiled – Critically imperiled in the State because of extreme rarity (often 5 or fewer populations) or because of factor(s) such as very steep declines making it especially vulnerable to extirpation from the State. S2 = Imperiled – Imperiled in the State because of rarity due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors making it very vulnerable to extirpation from the State. S3 = Vulnerable – Vulnerable in the State due to a restricted range, relatively few populations (often 80 or fewer), recent and widespread declines, or other factors making it vulnerable to extirpation from the State. S4 = Apparently Secure – Uncommon but not rare in the State; some cause for long-term concern due to declines or other factors. S5 = Secure – Common, widespread, and abundant in the State.</p> <p>California Rare Plant Rankings (CNPS List): 1A = Plants presumed extirpated in California and either rare or extinct elsewhere. 1B = Plants rare, threatened, or endangered in California and elsewhere.</p>				

2A = Plants presumed extirpated in California, but common elsewhere.
2B = Plants rare, threatened, or endangered in California, but more common elsewhere.
3 = Plants about which more information is needed; a review list.
4 = Plants of limited distribution; a watch list.

Threat Ranks:

.1 = Seriously threatened in California (over 80% of occurrences threatened / high degree and immediacy of threat)
.2 = Moderately threatened in California (20-80% occurrences threatened / moderate degree and immediacy of threat)
.3 = Not very threatened in California (less than 20% of occurrences threatened / low degree and immediacy of threat or no current threats known)

As noted in Table 8, 60 sensitive species and four habitats have been documented in the *Riverside East* and *Riverside West* USGS 7.5-minute series quadrangles. This list of sensitive species and habitats includes any State and/or federally listed threatened or endangered species, CDFW designated Species of Special Concern (SSC), and otherwise Special Animals. "Special Animals" is a general term that refers to all taxa the CNDDB is interested in tracking, regardless of their legal or protection status. This list is also referred to as the list of "species at risk" or "special status species." The California Department of Fish and Wildlife (CDFW) considers the taxa on this list to be those of greatest conservation need. An analysis of the likelihood of occurrence for all sensitive species documented in the *Riverside East* and *Riverside West* quads on the Project site is provided in Table 8, above. This analysis considers species range as well as documentation within the vicinity of the Project site and includes the habitat requirements for each species and the potential for their occurrence on the site, based on required habitat elements and range relative to the current site conditions. According to the databases, no sensitive habitat, including U.S. Fish and Wildlife Service (USFWS) designated critical habitat, occurs within or adjacent to the Project site.

Plant species and wildlife observed onsite are listed below.

Plant Species

Plant species identified on-site include Peruvian pepper tree (*Schinus mole*), Mexican fan palm (*Washingtonia robusta*), Russian thistle (*Salsola tragus*), oleander (*Nerium oleander*), wild oat (*Avena fatua*), yellow tobacco tree (*Nicotiana glauca*), brittlebush (*Encelia farinosa*), and California buckwheat (*Eriogonum fasciculatum*).

Wildlife Species

Wildlife species observed on site include house finch (*Carpodacus mexicanus*), common raven (*Corvus corax*), Anna's hummingbird (*Calypte anna*), and lesser goldfinch (*Spinus psaltria*). California ground squirrel (*Otospermophilus beecheyi*) burrows were found at the southern base of the cliff on site.

Species with a Moderate Potential to Occur

- Table 8 summarizes the database search and provides an analysis of the potential for these species to occur. Species identified in this section are identified to have a "moderate" potential to occur.
- **Plummer's mariposa Lily** - this species typically is found in coastal scrub, chaparral, valley and foothill grassland, cismontane woodland, lower montane coniferous forest. Occurs on rocky and sandy sites, usually of granitic or alluvial material. The habitat on site is ruderal annual grassland with some remnant coastal scrub species. This species could be present within the northern portion of the site where remnant, patchy coastal sage scrub plants were found. However, this species is not ranked as a high or moderate risk for extinction. The Riverside MSHCP also did not identify that this parcel required surveys for narrow endemic plant species. Therefore, the project would have a less than significant impact to this species;
- **Smooth tarplant** - this species is typically found in valley and foothill grassland, chenopod scrub, meadows and seeps, playas, riparian woodland, or alkali meadow, alkali scrub; also, in disturbed places. The habitat on site is ruderal annual grassland with some remnant coastal scrub species. This species could be present within the northern portion of the site where remnant, patchy coastal sage scrub plants were found. However, this species is not ranked as a high or moderate risk for extinction. The Riverside MSHCP also did not identify that this parcel required surveys for narrow endemic plant species. Additionally, this species would have been blooming during the field surveys and would have been discovered during the site visits. Therefore, the project would have a less than significant impact to this species.

- **Parry's spineflower** – Typically found in coastal scrub, chaparral, cismontane woodland, valley and foothill grassland. Habitat on site is ruderal annual grassland with some remnant coastal scrub species. This species could be present within the northern portion of the site where remnant, patchy coastal sage scrub plants were found. However, this species is not ranked as a high or moderate risk for extinction. The Riverside MSHCP also did not identify that this parcel required surveys for narrow endemic plant species. Therefore, the project would have a less than significant impact to this species.
- **Paniculate tarplant** – This species can be found in coastal scrub, valley and foothill grassland, vernal pools, but usually in vernal mesic sites, and sometimes in vernal pools or on mima mounds near them. The habitat on site is ruderal annual grassland with some remnant coastal scrub species, and there are no vernal pools or vernal mesic sites. This species could be present within the northern portion of the site where remnant, patchy coastal sage scrub plants were found. However, this species is not ranked as a high or moderate risk for extinction. The Riverside MSHCP also did not identify that this parcel required surveys for narrow endemic plant species. Therefore, the project would have a less than significant impact to this species.
- **Cooper's hawk** – This species prefers woodland, chiefly of open, interrupted or marginal type. Nest sites are mainly in riparian growths of deciduous trees, as in canyon bottoms on river flood-plains; also, live oaks. There are trees on site and in the general vicinity that can provide suitable habitat for this species. No nests were observed in the trees on site. Even though the Project may impact the trees on site, the Cooper's hawk will utilize a variety of trees for nesting and roosting, and there are numerous trees in the general Project area. A pre-construction nesting bird survey is recommended. With the nesting survey, there is a less than significant impact.
- **Southern California rufous-crowned sparrow** – A resident in Southern California coastal sage scrub and sparse mixed chaparral. Frequents relatively steep, often rocky hillsides with grass and forb patches. Steep, rocky cliffside preferred by this species is on site, and some coastal scrub species occur on and near the cliff. The Project is not anticipated to impact the cliff or hillside that exists on the western portion of the site. Therefore, there is a less than significant impact.
- **Stephens' kangaroo rat** - Primarily annual & perennial grasslands, but also occurs in coastal scrub & sagebrush with sparse canopy cover. Prefers buckwheat, chamise, brome grass and filaree. Will burrow into firm soil. Habitat on site is marginally suitable for this species, mostly in the northern area where there is patchy coastal sage scrub species and grassland. However, this area is small, isolated, and does not provide connectivity to other areas that would be suitable for this species. The Riverside MSHCP has a Stephen's kangaroo rat fee structure to off-set development.
- **Western mastiff bat** – Prefers open, semi-arid to arid habitats, including conifer & deciduous woodlands, coastal scrub, grasslands, chaparral, etc. Roosts in crevices in cliff faces, high buildings, trees and tunnels. The cliff face in the western area of the site provides suitable roosting habitat for this species. The Project is not anticipated to disturb the cliff, therefore, there is a less than significant impact.
- **Western yellow bat** – this species is typically found in valley foothill riparian, desert riparian, desert wash, and palm oasis habitats. Palm trees suitable for roosting are on site and water sources are available within a one mile radius. Roosts in trees, particularly palms. Forages over water and among trees. A pre-construction nesting bird survey is recommended. With the implementation of this recommendation, there would be a less than significant impact.
- **Pocketed free-tailed bat** – This species prefers a variety of arid areas in Southern California; pine-juniper woodlands, desert scrub, palm oasis, desert wash, desert riparian, etc., especially rocky areas with high cliffs. The cliff face in the western portion of the site provides suitable roosting habitat for this species. However, the Project is not anticipated to impact the cliff area, therefore, there is a less than significant impact.
- **Southern California legless lizard** – Typically occurs in sandy or loose loamy soils under sparse vegetation, and typically prefer soils with a high moisture content. Suitable habitat for this species occurs at the base of the cliff where less drought-tolerant species occur. The Project is not anticipated to significantly impact the suitable habitat area where this species could occur. Therefore, there is a less than significant impact.
- **California glossy snake** – Generally reported from a range of scrub and grassland habitats, often with loose or sandy soils. Suitable habitat for this species occurs at the base of the cliff where less drought-tolerant species

occur. The Project is not anticipated to significantly impact the suitable habitat area where this species could occur. Therefore, there is a less than significant impact.

- **Red-diamond rattlesnake** - Chaparral, woodland, grassland, & desert areas from coastal San Diego County to the eastern slopes of the mountains. Occurs in rocky areas and dense vegetation. Needs rodent burrows, cracks in rocks or surface cover objects. Habitat on site is primarily ruderal annual grassland. The snake may be preyed on by kingsnakes, roadrunners and possibly owls, according to the California's Department of Fish and Wildlife, and it has lost habitat as human developments expand into its range. Nevertheless, it is ranked as a species of "least concern" by the International Union for Conservation of Nature and Natural Resources. However, the species' population trend is down, and it may face long-term threats. In fact, said the San Diego Natural History Museum, it is listed as a "Special Concern species" by both the Federal and California state governments. Due to the urban nature of the area with prey species, as well as the Project site not providing any wildlife corridor function, it is not likely that this species will be present within the Project area. A recommendation for worker awareness training will reduce potential impacts.

Burrowing Owl (BUOW)

Although not a State- or federally-listed as threatened or endangered species, burrowing owl (*Athene cunicularia*) are considered a State and federal SSC and are a migratory bird protected by the international treaty under the Migratory Bird Treaty Act of 1918 (MBTA) and by State law under the California Fish and Game Code (CDFG Code #3513 & #3503.5). Burrowing owl have been documented locally in suitable habitat areas, and as previously noted above, suitable Burrowing owl habitat was determined present on the undeveloped portion of the site on a previous Burrowing Owl Burrow Reconnaissance Survey prepared by FirstCarbon Solutions in 2015.

The nearest documented BUOW occurrence is an extirpated occurrence 2.76 miles southwest of the survey area (CNDDDB, 2005). The previous habitat assessment (FirstCarbon Solutions, 2015) found habitat on site to be suitable, and identified in the report that one BUOW was observed perched on a telephone line. Because no information on the BUOW was provided (such as where it flew to, how long it was observed, what it was doing on site, etc.) or submitted to the CNDDDB, this occurrence was not used as the nearest recorded occurrence. The only suitable habitat within the Project area occurs within the undeveloped portion of the parcel; **Exhibit 6, BUOW Suitable Habitat**. There are ground squirrel burrows along the cliff in this portion that are potentially suitable for BUOW.

The proposed Project would not impact, either directly or through habitat modifications, any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. No sensitive or special status plant species are identified to occur on-site. The results of the protocol surveys were that no burrowing owls or recent or historic sign (molted feathers, whitewash, cast pellets or prey remains, or whitewash) were observed during the surveys. However, habitat on site is suitable for BUOW in the undeveloped portion of the parcel. Based on site conditions, the likelihood of burrowing owl is moderate, but based on the Habitat Resources Study, BUOW was determined to be currently absent. To ensure that there are no impacts to burrowing owl, the following Mitigation Measure is recommended:

Mitigation Measures:

BIO-1: General Species Avoidance and Minimization

If construction activity is conducted between September 1st and January 31st, then this mitigation measure is required prior to issuance of a grading permit. Federal Migratory Bird Treaty Act (MBTA) and/or state code protect all native bird species - both common and special status. In most scenarios, MSHCP coverage does not override the nesting bird protections provided by these. Impacts to nesting birds, both direct and indirect, can be minimized or eliminated by conducting work activities outside of the local breeding season. Although nesting can occur in any month in southern California for some species, breeding in the study area, given the habitat, would primarily be expected from about 1 February through 31 August. Work from about 1 September through 31 January would avoid most negative affects to birds and nesting activity. If work must be done during the breeding season, surveys for nesting birds should occur no more than three (3) days prior to all vegetation clearing and ground disturbance. If active nests are found, they should be avoided until young have fledged. While there is no established protocol for nest avoidance, when consulted the CDFW generally recommends avoidance buffers of about 500 feet for raptors and threatened/endangered species and 100 - 300 feet for non-raptors. Adherence to these nesting bird recommendations will also avoid and/or mitigate impacts to special status bird species known from the project site which are not covered by the MSHCP.

BIO-2:	Burrowing Owl				
<p>A focused BUOW survey must be conducted during the breeding season (four visits between 1 March - 31 August). Regardless of the result of those surveys, because of the presence of suitable habitat that could be occupied at any time, a one-day preconstruction survey must also be conducted 30 days or less before groundbreaking.</p>					
<p>With implementation of Mitigation Measures BIO-1, and BIO-2, a less than significant impact would occur.</p>					
<p>b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?</p> <p>c. Have a substantial adverse effect on state or federally-protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<p>4b and 4c. Response: (Source: City of Riverside GIS/CADME USGS Quad Map Layer, Biological Resources Assessment, Jurisdictional Delineation, Burrowing Owl Habitat Assessment, Riverine/Riparian and Vernal Pool Assessment, prepared by Jericho Systems on October 1, 2020)</p>					
<p>Less than Significant Impact. The City of Riverside is a signatory to the MSHCP. The MSHCP requires that a project comply with the MSHCP policies identified in Section 6 of the MSHCP. A review of the RCA MSHCP Information Map determined that the subject parcel is located within the Riverside Habitat Management Unit and in a designated survey area for BUOW. Consistent with Section 6.3.2 of the MSHCP, a habitat suitability assessment for BUOW was conducted. The initial site assessment determined that potentially suitable habitat for BUOW occurred onsite and as a result, follow-up focused surveys for BUOW were conducted; refer to Response 3(a), above. Focused surveys determined BUOW to be absent from the site.</p>					
<p>The Project site is not located within any MSHCP designated criteria cell, cell group, or area identified for conservation. The Project site is not located in an amphibian, criteria area species, mammal, or narrow endemic plant survey area. The Project site was evaluated for wetlands and Riparian/Riverine Vernal Pool resources as per MSHCP section 6.1.2, and field surveys determined these resources to be absent from the site. Other wildlife with potential to existing in vernal pools and riparian habitat such as fairy shrimp and riparian birds were reviewed for their potential to exist onsite.</p>					
<p>Fairy Shrimp</p>					
<p>Fairy shrimp can be found in non-vernal pool features such as stock ponds, ephemeral pools, road ruts, human-made depressions, or other depressions that may pond water. If vernal pools or other suitable fairy shrimp habitats are located within the Project site then fairy shrimp surveys must be conducted pursuant to USFWS Survey Guidelines for the Listed Large Branchiopods (May 31, 2015), which includes six listed fairy shrimp species, including those species covered under the MSHCP Section 6.1.2 which include but are not limited to:</p>					
<ul style="list-style-type: none"> • Riverside fairy shrimp (<i>Streptocephalus woottoni</i>) • Santa Rosa Plateau fairy Shrimp (<i>Linderiella santarosae</i>) • Vernal Pool fairy shrimp (<i>Branchinecta lynchi</i>) 					
<p>The habitat assessment revealed that no habitat features suitable for fairy shrimp exist on site. Therefore, evaluations for the presence of fairy shrimp were not warranted or required.</p>					
<p>Riparian Birds</p>					
<p>Riparian birds covered under the MSHCP such as the Least Bell's vireo (<i>Vireo bellii pusillus</i>) (LBVI), Southwestern willow flycatcher (<i>Empidonax trallii extimus</i>) (SWWF) and Yellow-billed cuckoo (<i>Coccyzus americanus</i>) (YBCU) are found only in well-developed riparian habitat. Although Table 8 notes that the site exhibits some riparian habitat, no well-developed riparian habitat exist. The entire site is surrounded by ruderal habitat and low density residential. The habitat on site is not suitable for use by riparian birds, but, as noted in Table 8, there is always a moderate chance that birds could dwell in the future. Therefore, With implementation of Mitigation Measure BIO-1 pre-construction nesting survey, riparian birds would have a less than significant impact.</p>					

Wetlands				
No jurisdictional waters occur onsite, and no impact to riparian habitat, sensitive natural communities, federally protected wetlands, marsh, vernal pool, coastal habitat would be impacted with the implementation of the proposed Project. Therefore, a less than significant impact would occur.				
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>4d. Response: (Source: MSHCP, General Plan 2025 –Figure OS-7 – MSHCP Cores and Linkage and Biological Resources Assessment, Jurisdictional Delineation, Burrowing Owl Habitat Assessment, Riverine/Riparian and Vernal Pool Assessment, prepared by Jericho Systems on October 1, 2020)</p> <p>Less than Significant Impact with Mitigation Incorporated. Refer to Response 4(a). The Project site is not located within any MSHCP Criteria Cells, Cores, or Linkages. The MBTA (16 U.S.C 703-711) provides protection for nesting birds that are both residents and migrants whether or not they are considered sensitive by resource agencies. The MBTA makes it unlawful to take, possess, buy, sell, purchase, or barter any migratory bird listed under 50 CFR 10, including feathers or other parts, nests, eggs, or products, except as allowed by implementing regulations (50 CFR 21). The direct injury or death of a migratory bird, due to construction activities or other construction-related disturbance that causes nest abandonment, nestling abandonment, or forced fledging would be considered a take under federal law. The USFWS, in coordination with CDFW administers the MBTA. CDFW’s authoritative nexus to MBTA is provided in FGC Section 3503.5 which protects all birds of prey and their nests and FGC Section 3800 which protects all non-game birds that occur naturally in the State. Additionally, vegetation suitable for nesting birds does exist within and adjacent to the Project site and most birds are protected by the MBTA.</p> <p>Bird nesting season generally extends from February 1 through September 15 in southern California and specifically, April 15 through August 31 for migratory passerine birds. In general, Projects should be constructed outside of this time to avoid impacts to nesting birds. If a Project cannot be constructed outside of nesting season, the Project site shall be surveyed for nesting birds by a qualified avian biologist prior to initiating the construction activities. If active nests are found during the pre-construction nesting bird surveys, a Nesting Bird Plan (NBP) will be prepared and implemented. At a minimum, the NBP will include guidelines for addressing active nests, establishing buffers, monitoring, and reporting. The NBP will include a copy of maps showing the location of all nests and an appropriate buffer zone around each nest sufficient to protect the nest from direct and indirect impact. The size and location of all buffer zones, if required, shall be determined by the biologist, and shall be based on the nesting species, its sensitivity to disturbance, and expected types of disturbance. The nests and buffer zones shall be field checked weekly by a qualified biological monitor. The approved buffer zone shall be marked in the field, within which no vegetation clearing or ground disturbance shall commence until the qualified biologist has determined the young birds have successfully fledged or that the nest has otherwise become inactive. Based on these standards procedures, the Project would have a less than significant impact on the movement of migratory fish and birds.</p> <p>A less than significant impact would occur on migratory birds with implementation of Mitigation Measure BIO-1.</p>				
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>4e. Response: (Source: MSHCP, Title 16 Section 16.72.040 – Establishing the Western Riverside County MSHCP Mitigation Fee, Title 16 Section 16.40.040 – Establishing a Threatened and Endangered Species Fees, City of Riverside Urban Forest Tree Policy Manual, and Biological Resources Assessment, Jurisdictional Delineation, Burrowing Owl Habitat Assessment, Riverine/Riparian and Vernal Pool Assessment, prepared by Jericho Systems on October 1, 2020)</p> <p>Less than Significant Impact. Implementation of the proposed Project is subject to all applicable Federal, State, and local policies and regulations related to the protection of biological resources and tree preservation. In addition, the Project is required to comply with Riverside Municipal Code Section 16.72.040 establishing the MSHCP mitigation fee and Section 16.40.040 establishing the Threatened and Endangered Species Fees. The Project site contains 31 palms</p>				

and 24 other trees which are anticipated to remain at entries and street perimeter where possible. Additionally, the Project anticipates providing 78 new trees; that is, 10 more trees than required by the City.

Any planting of a street tree within a City right-of-way will follow the Urban Forest Tree Policy Manual. The Manual documents guidelines for the planting, pruning, preservation, and removal of all trees in City rights-of-way. The specifications in the Manual are based on national standards for tree care established by the International Society of Arboriculture, the National Arborists Association, and the American National Standards Institute. The Project will be in compliance with the Tree Policy Manual when planting a tree within a City right-of-way, and therefore, impacts will be **less than significant**.

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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4f. Response: (Source: MSHCP, General Plan 2025 – Figure OS-6 – Stephen’s Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), Stephens’ Kangaroo Rat Habitat Conservation Plan, Biological Resources Assessment, Jurisdictional Delineation, Burrowing Owl Habitat Assessment, Riverine/Riparian and Vernal Pool Assessment, prepared by Jericho Systems on October 1, 2020)

Less than Significant Impact. A habitat assessment prepared by a qualified biologist (Biological Resources Assessment, Jurisdictional Delineation, Burrowing Owl Habitat Assessment, Riverine/Riparian and Vernal Pool Assessment, prepared by Jericho Systems on October 1, 2020) was prepared for the Project. The habitat assessment found the proposed Project to be located within River Habitat Management Unit in an area that requires focused BUOW surveys be conducted if suitable habitat is present. The site is not located within any MSHCP designated criteria cell, cell group, or area identified for conservation. Further, the Project site is not located in an amphibian, criteria area species, mammal, or narrow endemic plant survey area and assessment were conducted in accordance with MSHCP.

Therefore, impacts directly, indirectly and cumulatively are **less than significant impacts** to the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.



Legend

- Site Location
- BOUW Suitable Habitat
- 500ft Survey Buffer - Binocular Survey Only
- Transects

Source: Jericho Systems Inc.

EXHIBIT 6: BOUW Suitable Habitat
Orangecrest Community Church

\\ivrp01\CA_RIV1\RIV_GIS\195272001- Orangecrest Church\6 BOUW Suitable Habitat.mxd



5. CULTURAL RESOURCES.

Would the project:

a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5 of the CEQA Guidelines?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5 of the CEQA Guidelines?				

5(a & b). Response: (Source: Title 20 of the Riverside Municipal Code, GP 2025 FPEIR Figure 5.5-1 - Archaeological Sensitivity and Figure 5.5-2 - Prehistoric Cultural Resources Sensitivity, AB 52 Consultation and site specific Cultural Resources Assessment prepared by BCR Consulting LLC. In February 19, 2021, provided as Appendix B – Cultural Resources Assessment)

Less than Significant Impact. The proposed Project involves the rehabilitation of the existing two buildings and the construction of three additional buildings. The pedestrian cultural resources survey was intended to locate and document previously recorded or new cultural resources, including archaeological sites, features, isolates, and historic-period buildings, that exceed 45 years in age within defined Project boundaries.

Methodology

Research. A preliminary records search was conducted by BCR Consulting staff using results from previously completed cultural resources reports in the surrounding area, review of the National Register of Historic Places (NRHP), California State Historical Landmarks, California Points of Historical Interest, Riverside County Historical Landmarks, Landmarks of the City of Riverside, and Historic Districts of Riverside. In addition, the Built Environment Resource Directory (BERD) was reviewed for Riverside County. Additional land use history research was performed through the City of Riverside, the Riverside Public Library, the Riverside County Assessor and Recorder, General Land Office records of the Bureau of Land Management, and the County of Riverside Robert J. Fitch Archives.

Field Survey. An intensive-level cultural resources field survey of the project site was conducted on August 20 and 26, 2020. The survey was conducted by walking parallel transects spaced approximately 10-15 meters apart across the project site. The historic-period Riverside Swim and Tennis Club was recorded on DPR 523 forms. Context views and detail photographs were taken of the historic-period resource and at various points within the project boundaries (see Appendix B). Cultural resources were recorded per the California OHP Instructions for Recording Historical Resources in the field using:

- Detailed note taking for entry on DPR forms (Appendix A to the Cultural Resources Assessment)
- Hand-held Garmin Global Positioning systems for mapping purposes

No additional cultural resources were identified within the Project site boundaries. The Project site exhibited approximately 50 percent surface visibility on the western undeveloped portion of the Project site, and approximately five percent within the developed portion.

Records Search. Research completed through the EIC indicates that 18 previous cultural resource studies have taken place resulting in the identification of 6 cultural resources within 1.0 mile of the Project site. The Project site has not been subject to previous cultural resources assessment and no cultural resources have been previously identified within its boundaries. The records search results are summarized in **Table 9, Cultural Resources Within One Mile of the Project Site.**

Table 9: Cultural Resources Within One-Mile of the Project Site

USGS 7.5 Min Quadrangle	Cultural Resources Within One Mile of the Project Site
Riverside East, California (1980)	P-33-4768: Historic Water Conveyance System P-33-13927: Prehistoric Bedrock Milling Site P-33-20333: Historic Trash Scatter; Historic Dam P-33-23874: Prehistoric Bedrock Milling Site P-33-23957: Prehistoric Bedrock Milling Site P-33-23986: Historic Single-Family Property
Source: BCR Consulting, LLC. February 19, 2021. Cultural Resources Assessment. Appendix B.	

Field Survey. During the field survey, BCR Consulting personnel identified the historic-period Riverside Swim and Tennis Club. This cultural resource occupies the eastern two thirds of the property. The western third of the Project site is not developed. The Riverside Swim and Tennis Club is described below and has been documented using California DPR 523 forms. No additional cultural resources were identified within the Project site boundaries. The Project site exhibited approximately 50 percent surface visibility on the western undeveloped portion of the Project site, and approximately five percent within the developed portion. Vegetation included white sage, date palm trees and a variety of non-native shrubs, trees, and seasonal grasses.

Riverside Swim and Tennis Club. The property was formerly used as a swim and tennis club. Two historic-age buildings, two demolished pools, and eight tennis courts remain on the Project site. The pool deck and tennis courts are enclosed by cement block walls and chain-link fencing. In the center of the pool deck is a large pool that has been demolished and filled with dirt. A smaller pool (also filled with dirt) is located about 30 feet southwest of the large pool. Building A is located south of the large pool, while Building B is located on the east side of the pool deck. Both buildings are rectangular in plan and share architectural features typical of the mid-century modern style. Building A, formerly used for office space and dressing rooms for the Riverside Swim and Tennis Club, has a flat roof with exposed structural beams.

It is constructed of square concrete masonry units with decorative concrete masonry unit screen walls along the street facade. At the northeast corner of the building, an extension of the roof overhang shelters a built-in L-shaped desk. Building B, formerly used for snack and recreational space for the Club, also features concrete masonry walls and a flat roof with exposed structural members and deep overhang. All windows and doors have been boarded up. The buildings are in fair condition. In the center of the facility, between the pool deck and tennis courts, there is a vacant garden area. The area is filled with dirt, but some of the wood used to line planters is still visible. Eight tennis courts are situated to the west and north of the pool deck. They are partitioned by tall chain-link fences and connected by a concrete walkway. The courts show significant neglect, as the concrete is cracked and overgrown with weeds. South of the enclosed pool deck and tennis courts is a large asphalt-paved parking lot. The parking lot is in poor condition, with large cracks and potholes forming in the asphalt. A small ancillary structure, featuring a flat roof and concrete veneer cladding, is situated in the south corner of the parking lot.

Sacred Land File Search and Tribal Scoping. The NAHC replied on August 19, 2020. Results of Sacred Land File Search did not indicate the presence of Native American cultural resources and recommended that the below groups/individuals be contacted. BCR Consulting sent notifications to tribes on October 16, 2020. The Tribes contacted are provided in Table C of the Cultural Report and additionally, correspondence is summarized below and available responses are attached in their entirety as Appendix C of the Cultural Report provided in this Initial Study as Appendix B). These are up to date as of October 22, 2020.

Significance Evaluations. The California Environmental Quality Act (CEQA) calls for the evaluation and recordation of historic and archaeological resources. The criteria for determining the significance of impacts to cultural resources are based on §15064.5 of the *CEQA Guidelines* and Guidelines for the Nomination of Properties to the CRHR. Properties eligible for listing in the CRHR and subject to review under CEQA are those meeting the criteria for listing in the CRHR, or designation under a local ordinance. The City of Riverside Community Development Department Consultant Requirements for Cultural Resources Survey, Studies and Reports Information Sheet also indicates that evaluation for local designation eligibility should be performed per City of Riverside Municipal Code Title 20 (Cultural Resources Ordinance), County Landmark, etc. Since there is no federal review of this Project, NRHP eligibility evaluation is not required.

As part of the goals and policies of the Historic Preservation Element of the General Plan, Riverside maintains an active and systematic program to survey cultural resources citywide. Surveys are completed for a variety of reasons. Surveys reveal what properties are architecturally and historically significant and what properties are eligible for designation. They also facilitate environmental review processes, promote heritage tourism initiatives, and serve as the basis for establishing historic districts and developing design guidelines.

Significance Criteria

Because this work was completed pursuant to CEQA, the resource identified within the Project site boundaries requires evaluation for the California Register. The City of Riverside Community Development Department Consultant Requirements for Cultural Resources Survey, Studies and Reports Information Sheet also indicates that evaluation for local designation eligibility should be performed per City of Riverside Municipal Code Title 20 (Cultural Resources Ordinance), County Landmark, etc. Since there is no federal review of this Project, National Register of Historic Places eligibility evaluation is not required.

California Register of Historical Resources. The CRHR criteria are based on NRHP criteria. For a property to be eligible for inclusion on the CRHR, one or more of the following criteria must be met:

1. It is associated with the events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the U.S.;
2. It is associated with the lives of persons important to local, California, or U.S. history;
3. It embodies the distinctive characteristics of a type, period, region, or method of construction, represents the work of a master, possesses high artistic values; and/or
4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

In addition to meeting one or more of the above criteria, the CRHR requires that sufficient time has passed since a resource's period of significance to "obtain a scholarly perspective on the events or individuals associated with the resources." (CCR 4852 [d][2]). Fifty years is normally considered sufficient time for a potential historical resource, and in order that the evaluation remain valid for a minimum of five years after the date of this report, all resources older than 45 years will require evaluation. The CRHR also requires that a resource possess integrity. This is defined as the ability for the resource to convey its significance through seven aspects: location, setting, design, materials, workmanship, feeling, and association.

The Project site revealed that although the Swim and Tennis Club is of historical age, no structure was found to be specifically associated with events significant to local, state, or national history (Criterion 1). With regard to Criterion 2, substantial research has failed to connect the subject property with the lives of persons important in California's past. It is therefore not eligible for the CRHR under Criterion 2. Under Criterion 3, the buildings lack architectural distinction and do not display significant elements of the era during which they were constructed. They do not significantly represent the work of an important creative individual or possess high artistic values. Therefore, the subject property is not eligible under Criterion 3. Under Criterion 4, the subject property has not and is not likely to yield information important in prehistory or history and are therefore not eligible for listing under Criterion 4. The subject property and its historic-age buildings are therefore recommended **not eligible** under any of the four criteria for listing on the CRHR, and as such are not recommended historical resources under CEQA. See the Cultural Resources Assessment provided in Appendix B of this Initial Study, for detailed discussion of the CRHR evaluation.

Local Designation Eligibility. A review of the City Historic Resources Inventory, Existing and Potential Historic District and Neighborhood Conservation Areas, and Landmarks of the City of Riverside were all completed for the Project site. Chapter 20.50.010 of the City municipal code defines a City Landmark as:

Any improvement or natural feature that is an exceptional example of a historical, archaeological, cultural, architectural, community, aesthetic or artistic heritage of the City, retains a high degree of integrity, and meets one or more of the following criteria:

1. Research has not indicated that the subject property and its constituent historic-age buildings and features exemplify or reflect special elements of the City's cultural, social, economic, political, aesthetic, engineering, architectural, or natural history;
2. Research failed to associate the subject property with any persons or events significant in local, state or national history;

3. Research and analysis has shown that the subject property and its constituent historic-age buildings and features do not embody distinctive characteristics of a style, type, period or method of construction, or is a valuable example of the use of indigenous materials or craftsmanship;
4. The project site and its buildings and features do not represent the work of a notable builder, designer, or architect, or important creative individual;
5. The project site and its buildings and features do not embody elements that possess high artistic values or represent a significant structural or architectural achievement or innovation;
6. Research has failed to show that the subject property reflects significant geographical patterns, including those associated with different eras of settlement and growth, particular transportation modes, or distinctive examples of park or community planning, or cultural landscape;
7. Since research and analysis has demonstrated that the project site does not possess distinguishing characteristics, it is not one of the last remaining examples in the City, region, State, or nation possessing distinguishing characteristics of an architectural or historical type or specimen; or
8. The project site has been subject to severe disturbances associated with previous mining activities and the development of the Riverside Swim and Tennis Club. It has not and is not likely to yield information important in history or prehistory.

Additionally, according to Figure 5.5-1 - Archaeological Sensitivity and Figure 5.5-2 - Prehistoric Cultural Resources Sensitivity of the General Plan, the Project site is not located in an archaeological sensitivity area and is identified as being located in a medium prehistoric cultural sensitivity zone. Based on this and on the Cultural Resources Assessment findings, it is concluded that the Project site does not qualify as a City Landmark. A review of the City Historic Resources Inventory, Existing and Potential Historic District and Neighborhood Conservation Areas, and Landmarks of the City of Riverside failed to indicate that the Project site had been locally designated. It is therefore recommended not eligible for Local Designation.

As a result, BCR Consulting recommends a finding of no impacts to historical resources under CEQA for the current Project. BCR Consulting also recommends that no additional cultural resources work, or monitoring is necessary during proposed activities associated with the development of the Project site. However, if previously undocumented cultural resources are identified during earthmoving activities, a qualified archaeologist should be contacted to assess the nature and significance of the find, diverting construction excavation if necessary.

Thus, implementation of Conditions of Approval (COA) CUL-1 through CUL-4 would reduce potential impacts to cultural resources directly, indirectly and cumulatively as a result of the Project to a **less than significant** level.

Conditions of Approval

COA CUL-1: Prior to grading permit issuance, if there are any changes to project site design and/or proposed grades, the Applicant and the City shall contact consulting tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City, developer/applicant, and consulting tribes to discuss any proposed changes and review any new impacts and/or potential avoidance/preservation of the cultural resources on the project site. The City and the developer/applicant shall make all attempts to avoid and/or preserve in place as many cultural and paleontological resources as possible that are located on the project site if the site design and/or proposed grades should be revised. In the event of inadvertent discoveries of archaeological resources, work shall temporarily halt until agreements are executed with consulting tribe, to provide tribal monitoring for ground disturbing activities.

COA CUL-2: On call Project Archaeologist: Prior to the issuance of a grading permit, the Property Owner/Developer shall provide a letter from a County certified Archaeologist and Paleontologist stating that the Property Owner/Developer has retained these individuals, and that the Archaeologist and Paleontologist shall be on call during all grading and other significant ground-disturbing activities in native sediments.

COA CUL-3: Treatment and Disposition of Cultural Resources: In the event that Native American cultural resources are inadvertently discovered during the course of grading for this project, the following procedures will be carried out for treatment and disposition of the discoveries:

1. Consulting Tribes Notified: within 24 hours of discovery, the consulting tribe(s) shall be notified via email and phone. The developer shall provide the city evidence of notification to consulting tribes. Consulting tribe(s) will be allowed access to the discovery, in order to assist with the significance evaluation.
2. Temporary Curation and Storage: During the course of construction, all discovered resources shall be temporarily curated in a secure location on site or at the offices of the project archaeologist. The removal of any artifacts from the project site will need to be thoroughly inventoried with tribal monitor oversight of the process; and
3. Treatment and Final Disposition: The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for impacts to cultural resources. The Applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Riverside Community and Economic Development Department with evidence of same:
 - a. Accommodate the process for on-site reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed;
 - b. A curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore will be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation;
 - c. If more than one Native American tribe or band is involved with the project and cannot come to a consensus as to the disposition of cultural materials, they shall be curated at the Western Science Center or Museum of Riverside by default; and
 - d. At the completion of grading, excavation, and ground-disturbing activities on the site, a Phase IV Monitoring Report shall be submitted to the City documenting monitoring activities conducted by the project archaeologist and Native Tribal Monitors within 60 days of completion of grading. This report shall document the impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the archaeologist. All reports produced will be submitted to the City of Riverside, Eastern Information Center, and consulting tribes.

COA CUL-4: Cultural Sensitivity Training: The Secretary of Interior Standards County certified archaeologist and Native American monitors shall attend the pre-grading meeting with the developer/permit holder's contractors to provide Cultural Sensitivity Training for all construction personnel. This shall include the procedures to be followed during ground disturbance in sensitive areas and protocols that apply in the event that unanticipated resources are discovered. Only construction personnel who have received this training can conduct construction and disturbance activities in sensitive areas. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.

c. Disturb any human remains, including those interred outside of formal cemeteries?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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5c. Response: (Source: GP 2025 FPEIR Figure 5.5-1 - Archaeological Sensitivity and Figure 5.5-2 - Prehistoric Cultural Resources Sensitivity, and the AB 52 Consultation)

Less than Significant Impact. The proposed Project is not located within a High or Medium Archeological Sensitivity Zone. In regard to Prehistoric Cultural Resources Sensitivity Zone, the Project is located in a Medium Sensitivity Zone. Where construction is proposed in undeveloped areas, disturbance on vacant lands could have the potential to disturb or destroy buried Native American human remains as well as other human remains, including those interred outside of formal cemeteries. Consistent with State laws protecting these remains, sites containing human remains must be identified and treated in a sensitive manner. In the event that Native American human remains are inadvertently

discovered during Project related construction activities, there would be significant adverse impacts to Native American resources, but implementation of COAs CUL - 1 through CUL - 4 will, however, reduce impacts to human remains, including those interred outside of formal cemeteries to a less than significant level.				
6. ENERGY				
Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6a. Response: (Source: City of Riverside, California, Five Year Integrated Resource Plan 2018)				
<p>Less than Significant Impact. The proposed Project includes construction and operation of a community church on a site previously used as a swim and tennis club. The proposed Project would require the use of electricity, natural gas, and use of transportation fuel during the construction phase. The demand for these resources would be supplied from existing services within the proposed Project area. The overall construction activities would require minimal consumption of these resources as these activities would be temporary and conclude once the proposed Project construction is complete.</p> <p>The Project would be required to comply with the 2019 California Green Building Standards Code. The Project also would be required to comply with the building energy efficiency standards of California Code of Regulations Title 24, Part 6 in effect at the time of Project approval. Compliance with these standards would reduce energy consumption associated with Project operations. The emissions estimates for energy use provided in the CalEEMod output sheets in Appendix A of the Initial Study take into account these mandatory compliance measures.</p> <p>Overall, Project construction and operations would not consume energy resources in a manner considered wasteful, inefficient, or unnecessary. Project impacts related to energy consumption would be considered less than significant.</p>				
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6b. Response: (Source: City of Riverside, California, Five Year Integrated Resource Plan 2018)				
<p>Less than Significant Impact. The City of Riverside Public Utilities 2018 Integrated Resource Plan provides an impact analysis of Riverside's acquisition of new power resources, specifically towards meeting the state of California's aggressive carbon reduction goals, continuing to provide the highest quality electric services at the lowest possible rates, while adhering to a diverse set of state and regional legislative/regulatory mandates. The Project will comply with Title 24, Green Building Code, for all Project energy efficiency requirements. A less than significant impact would occur.</p>				
7. GEOLOGY AND SOILS				
Would the project:				
Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7i. Response: (Source: General Plan 2025 Figure PS-1 – Regional Fault Zones & General Plan 2025 FPEIR Appendix E – Geotechnical Investigation, prepared by Southern California Geotechnical (SCG), dated January 13, 2021; see Appendix D)				
<p>Less than Significant Impact. Southern California is a seismically active region containing many earthquake faults. According to Figure PS-1, <i>Regional Fault Zones</i>, of the General Plan 2025, and the Geotechnical Investigation, there are no Alquist-Priolo zones or fault lines that traverse the City. The closest faults to the Project site are the Elsinore and San Jacinto Faults which are located approximately 15.0 miles south and 18.0 miles northeast, respectively, from the</p>				

Project site. Furthermore, no evidence of faulting was discovered during the geotechnical investigation. Therefore, the possibility of significant fault rupture on the site is considered to be low. Lastly, any structures developed as a part of the Project will be subject to seismic design criteria in accordance with the latest California Building Code (CBC) which will reduce potential impacts to **less than significant** directly, indirectly and cumulatively.

ii. Strong seismic ground shaking?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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7ii. Response: (Source: General Plan 2025 FPEIR Appendix E – Geotechnical Investigation, prepared by Southern California Geotechnical, dated January 13, 2021, provided as Appendix)

Less than Significant Impact. The San Jacinto Fault Zone located in the northeastern portion of the City, or the Elsinore Fault Zone, located in the southern portion of the City’s Sphere of Influence, have the potential to cause moderate to large earthquakes that would cause intense ground shaking. As previously noted, the Project site is in an area of high regional seismicity. Ground shaking originating from earthquakes along active faults in the region is expected to induce lower horizontal accelerations due to smaller anticipated earthquakes and/or greater distances to other faults. The Project would be required to be in conformance with the most recently published CBC, City regulations, and other applicable standards. The CBC design standards correspond to the level of seismic risk in each location and are intended primarily to protect public safety and secondly to minimize property damage. Conformance with standard engineering practices and design criteria established in the latest CBC, would reduce the effects of seismic ground shaking to a **less than significant** level.

iii. Seismic-related ground failure, including liquefaction?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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7iii. Response: (Source: General Plan 2025 Figure PS-1 – Regional Fault Zones, Figure PS-2 – Liquefaction Zones, General Plan 2025 FPEIR Figure PS-3 – Soils with High Shrink-Swell Potential, and Appendix E – Geotechnical Investigation, prepared by Southern California Geotechnical, dated January 13, 2021, provided as Appendix ?)

Less than Significant Impact. Liquefaction is the loss of the strength in generally cohesionless, saturated soils when the pore-water pressure induced in the soil by a seismic event becomes equal to or exceeds the overburden pressure. The primary factors which influence the potential for liquefaction include ground water table elevation, soil type and grain size characteristics, relative density of the soil, initial confining pressure, and intensity and duration of ground shaking. The depth within which the occurrence of liquefaction may impact surface improvements is generally identified as the upper 50 feet below the existing ground surface. Liquefaction potential is greater in saturated, loose, poorly graded fine sands with a mean (d50) grain size in the range of 0.075 to 0.2 mm. Clayey (cohesive) soils or soils which possess clay particles (d<0.005mm) in excess of 20 percent are generally not considered to be susceptible to liquefaction, nor are those soils which are above the historic static groundwater table.

According to the General Plan 2025 Liquefaction Zones Map – Figure PS-2, and the Geotechnical Investigation results indicate that the Project site is located within a mapped zone of moderate liquefaction susceptibility. However, the subsurface conditions encountered at the boring and test pit locations consist of artificial fill materials underlain by very dense bedrock. Also, no water was encountered within the depths explored by the borings and test pits. Based on these conditions, no design considerations related to liquefaction are considered warranted for the project. Additionally, with compliance to the latest applicable CBC, a **less than significant impact** would occur.

iv. Landslides?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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7iv. Response: (Source: General Plan 2025 FPEIR Figure 5.6-1 – Areas Underlain by Steep Slope, Appendix E – Geotechnical Investigation, prepared by Southern California Geotechnical, dated January 13, 2021, Title 18 – Subdivision Code, Title 17 – Grading Code, Storm Water Pollution Prevention Plan SWPPP)

Less than Significant Impact. The Project site has two slopes, within the tennis courts and within the parking lots. However, geological features typically associated with landslides, such as hillsides or riverbanks, are not located in the developed portion of the site. Additionally, the City of Riverside General Plan’s Public Safety Element identifies the principal areas of steep slopes; such as the Box Springs Mountains, Alessandro Heights, Hawarden Hills and the east-facing slopes of the Norco Hills. The Project site is located outside of an area of steep slopes. Therefore, the Project’s location precludes impacts associated with landslides, and **less than significant impact** would occur.

b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>7b. Response: (Source: General Plan 2025 FPEIR Figure 5.6-1 – Areas Underlain by Steep Slope, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, Title 18 – Subdivision Code, Title 17 – Grading Code, and SWPPP, and Phase I Environmental Site Assessment prepared by Terracon on June 11, 2015)</p> <p>Less than Significant Impact. According to the Soil Survey of Project area, on-site soils are 62.5% (approximately 2.2 acres) buren fine sandy loam, 8 to 15 percent slopes, eroded and 37.5% (approximately 1.4 acres) fallbrook rocky sandy loam, shallow, 15 to 50 percent slopes, eroded. The USDA’s Soil Survey of Soil Erosion Hazards states that the Project site area is 62.5 percent slight and 37.5 percent moderate. A rating of “slight” indicates that erosion is unlikely under ordinary climatic conditions; “moderate” indicates that some erosion is likely and that erosion-control measures may be needed. Refer to Exhibit 7, Preliminary Grading Plan.</p> <p>The State of California is authorized to administer various aspects of the National Pollutant Discharge Elimination System (NPDES). Construction activities covered under the State’s Construction General Permit include removal of vegetation, grading, excavation, or any other activity that causes the disturbance of one acre or more. Construction activities would be required to implement Best Management Practices (BMPs) to prevent construction of the Project from potentially polluting surface waters from soil erosion. Additionally, the Project would be subject to comply with applicable provisions of State Law, including §15.04.210 of the CBC, Appendix J, §J112 – Grading Operations, which includes the following provisions:</p> <ul style="list-style-type: none"> • Section J112.1 General. “All parties performing grading operations, under a grading permit issued by the Building Official, shall have verification of land use entitlement and shall take reasonable preventive measures, as directed by the Building Official and incorporated into the Grading Policy promulgated by the Community Development Department, to avoid earth or other materials from the premises being deposited onto adjacent streets or properties, by the action of storm waters or wind, by spillage from conveyance vehicles or by other causes.” • Section J112.2 Removal of Materials Within 24 Hours. “Earth or other materials which are deposited on adjacent streets or properties shall be completely removed by the permittee as soon as practicable, but in any event within 24 hours after receipt of written notice from the Building Official, or NPDES Coordinator, or their designees, to remove the earth or materials, or within such additional time as may be allowed by written notice.” • Section J112.3 Noncompliance. “In the event that any party performing grading shall fail to comply with the requirements of this Section, the Building Official shall have the authority to engage the services of a contractor to remove the earth or other materials. All charges incurred for the services of the contractor shall be paid to the City by the permittee prior to acceptance of the grading.” <p>Additionally, most of the artificial fill soils possess appreciable silt content that may become unstable if exposed to significant moisture infiltration or disturbance by construction traffic. In addition, based on their granular content, some of the on-site soils will also be susceptible to erosion. As such, the Project site should, therefore, be graded to prevent ponding of surface water and to prevent water from running into excavations. If the construction schedule dictates that site grading will occur during a period of wet weather, allowances should be made for costs and delays associated with drying the on-site soils or import of a drier, less moisture-sensitive fill material. With adherence to the above-stated policies, BMPs, NPDES permits, State Law, and the Regional Water Quality Control Board (RWQCB) Construction General Permit, which requires the implementation of a variety of BMPs on construction and operation of the Project, this would minimize potential erosion from the site over the short- and long-term resulting in a less than significant impact.</p>				
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Landslides				

As previously discussed, the Project site does not contain features typically associated with landslides. Additionally, the Project site is not located in areas of steep slopes included within the City of Riverside’s General Plan 2025; refer to Exhibit 7.

Lateral Spreading

Lateral spreading is horizontal/lateral ground movement of relatively flat-lying soil deposits towards a free face such as an excavation, channel, or open body of water; typically, lateral spreading is associated with liquefaction of one or more subsurface layers near the bottom of the exposed slope. As failure tends to propagate as block failures, it is difficult to analyze and estimate where the first tension crack will form. However, the Project’s geotechnical reports states that the potential for lateral spreading affecting the site is low.

Subsidence

Land subsidence is a gradual settling or sudden sinking of the Earth’s surface owing to subsurface movement of earth materials. Subsidence is most often attributed to human activity, mainly from the removal of subsurface water. More than 80 percent of the identified subsidence throughout the United States is a result of exploitation of groundwater, with the increasing development of land and water resources threatening to exacerbate existing land subsidence problems and initiate new ones (U.S. Geological Survey). Other principal causes of subsidence are aquifer system compaction, drainage of organic soils, underground mining, hydrocompaction, natural compaction, sinkholes, and thawing permafrost.

Compaction of soils in some aquifer systems can accompany excessive groundwater pumping and is the single largest cause of subsidence. Excessive pumping of such aquifer systems has resulted in permanent subsidence and related ground failures. In some systems, when large amounts of water are pumped, the subsoil compacts, thereby reducing in size and number the open pore spaces in the soil the previously held water. This can result in a permanent reduction in the total storage capacity of the aquifer system.

According to the City of Riverside General Plan, the Project site is located within the recharge area of the Riverside South Water Basin. Therefore, the Project site is not located within a groundwater basin; land subsidence would also not be considered a substantial issue in the Project area. According to findings in the Geotechnical Investigation, the actual amount of subsidence is expected to be variable and will be dependent on the type of machinery used, repetitions of use, and dynamic effects, all of which are difficult to assess precisely. Therefore, impacts associated with subsidence are anticipated to be less than significant.

Liquefaction

As previously discussed in Response 7iii, above, according to the City of Riverside General Plan’s Public Safety Element, Figure PS-2, Liquefaction Zones, the Project site is not considered to be susceptible to liquefaction (Southern California Geotechnical, 2021). Therefore, impacts from liquefaction are considered less than significant.

Collapse

According to the site history, mining of granitic bedrock materials was performed at the site. Prior to 1948, the mining activities had ceased and the excavations were backfilled. According to the Geotechnical Investigation, the recommended remedial grading will remove the existing fill soils from the new building areas as well as a portion of the variable strength compressible alluvium and replace these materials as compacted structural fill. The native soils that will remain in place below the recommended depth of over excavation possess more favorable consolidation and collapse characteristics and will not be subject to significant load increases from the foundations of the new structures. Provided that the recommended remedial grading is completed, the post-construction settlements of the proposed structures are expected to be within tolerable limits. The proposed Project would not be located on an unstable or potentially unstable geologic unit or soils that would potentially result in landslide, lateral spreading, subsidence, or liquefaction. Impacts regarding collapse would be **less than significant**.

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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7d. Response: (Source: General Plan 2025 FPEIR Figure 5.6-4 – Soils, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, Figure 5.6-5 – Soils with High Shrink-Swell Potential, Appendix E – Geotechnical Report, and California Building Code as adopted by the City of Riverside and set out in Title 16 of the Riverside Municipal Code)

Less than Significant Impact. Expansive soils are soils with a significant amount of clay particles that have the ability to give up water (shrink) or take on water (swell). Fine-grained soils, such as silts and clays, may contain variable amounts of expansive clay minerals. When these soils swell, the change in volume exerts significant pressures on loads that are placed on them.

According to the Geotechnical Investigation findings, SCG previously performed a geotechnical feasibility study at the Project site. Additionally, as part of the proposed Project’s geotechnical investigation, SCG drilled a total of six boring to depth of 7 to 35 feet below the previously existing site grades; refer to **Exhibit 8, Boring and Trenching and Location Plan**. In addition, SCG excavated a total of three trenches to depth of 13 to 17 feet below previously existing site grades. SCG concluded that the Project site is underlain by artificial fill soils used to backfill excavations made for former minim operations on the site. The fill soils consist of fine to coarse sand, silty sands, and occasional fine sandy silts with varying coarse sand and varying gravel content. Laboratory testing indicates that these materials have very low expansion potentials (EI = 0). Additionally, the near surface bedrock materials are composed of granite and do not possess appreciable plasticity.

Due to the existing undocumented fill, the removal of undocumented fill soils would occur. Additionally, the over excavation would be extend to a depth of at least 5 feet below the proposed foundation bearing grade, due to the differing support characteristics of the very dense bedrock materials and compacted fill soils. The Geotechnical study concluded that the implementation of the proposed Project is feasible with compliance with the grading guide specifications provided in Appendix D of the Geotechnical study. Compliance with the recommendation of the Geotechnical report and applicable provision of the City’s Subdivision Code Title 18 and the California Building Code with regard to soil hazards related to the expansive soils will be reduced to a **less than significant impact** level for this Project, directly, indirectly and cumulatively.

e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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7e. Response: (Source: General Plan 2025 FPEIR Figure 5.6-4 – Soils, Table 5.6-B – Soil Types)

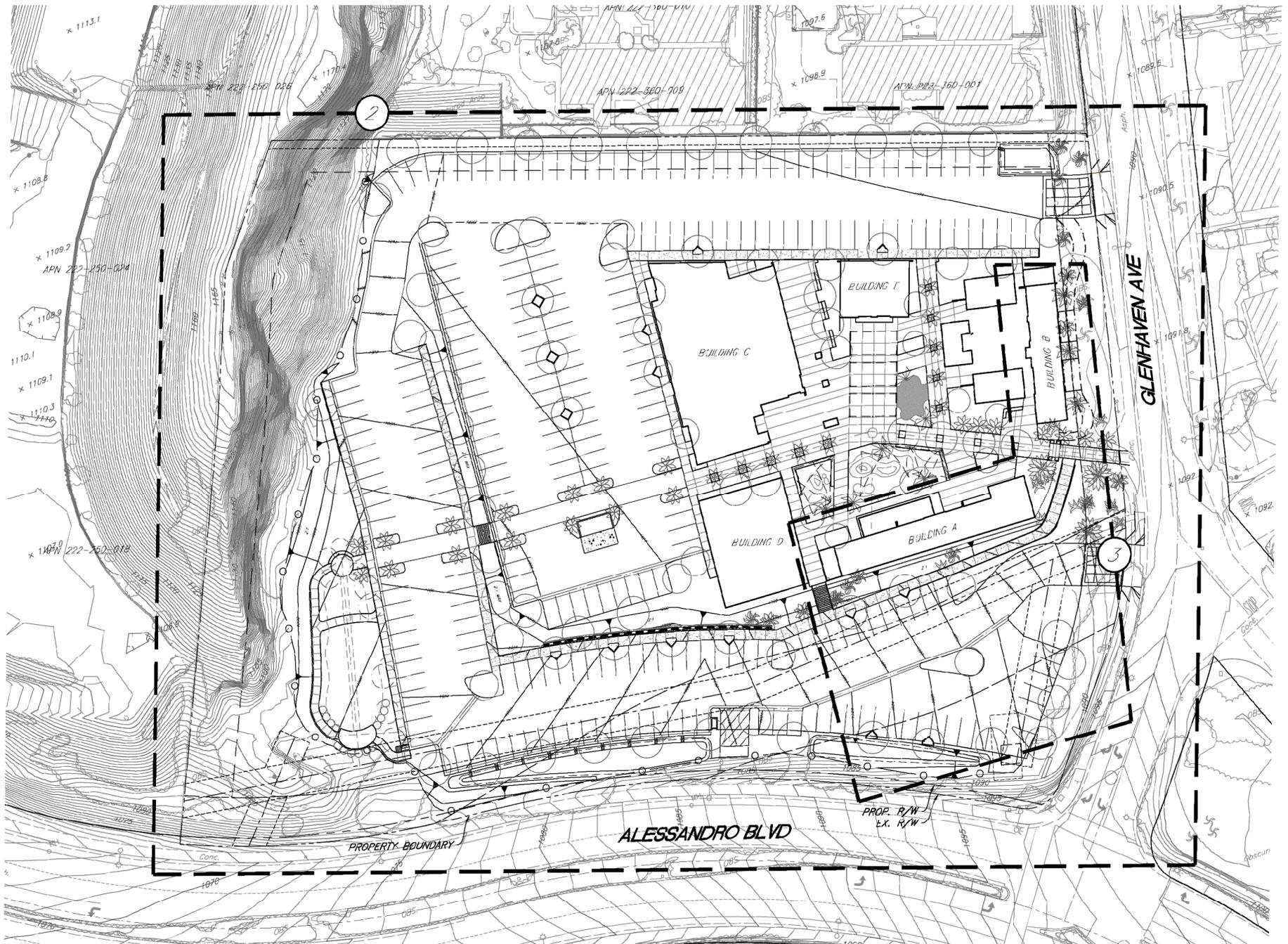
No Impact. The proposed project will be served by sewer infrastructure. Therefore, the Project will have **no impact**.

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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7f. Response: (Source: General Plan 2025 Policy HP-1.3, BCR Consulting Draft Cultural Resources Assessment dated October 22, 2020)

Less than Significant Impact. The Project is located on a previously developed and fully improved site within an urbanized area. Although the Project site has been previously graded, ground disturbance/construction activities from the new development, could damage or destroy fossils in rock units. As with archaeological resources, paleontological resources are generally considered to be historical resources, as defined in CEQA Guidelines §15064.5(a)(3)(D). Consequently, damage or destruction to these resources could cause a significant impact. The Cultural Resources Assessment prepared by BCR Consulting on February 19, 2021 and consultation with the Western Science Center (WSC) have determined that the proposed Project is not located in a site known for containing the presence of fossil material and it is unlikely to be paleontologically sensitive, but caution during development should be observed in the southwest Project area.

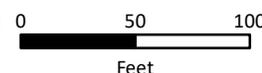
Additionally, the Project is consistent with General Plan Policy HP-1.3 including compliance with the Federal Native American Graves Protection and Repatriation Act. With compliance to COAs CUL-1 through CUL-4, the Project will have a **less than significant impact** directly or indirectly to a unique paleontological resource or site or unique geologic feature.



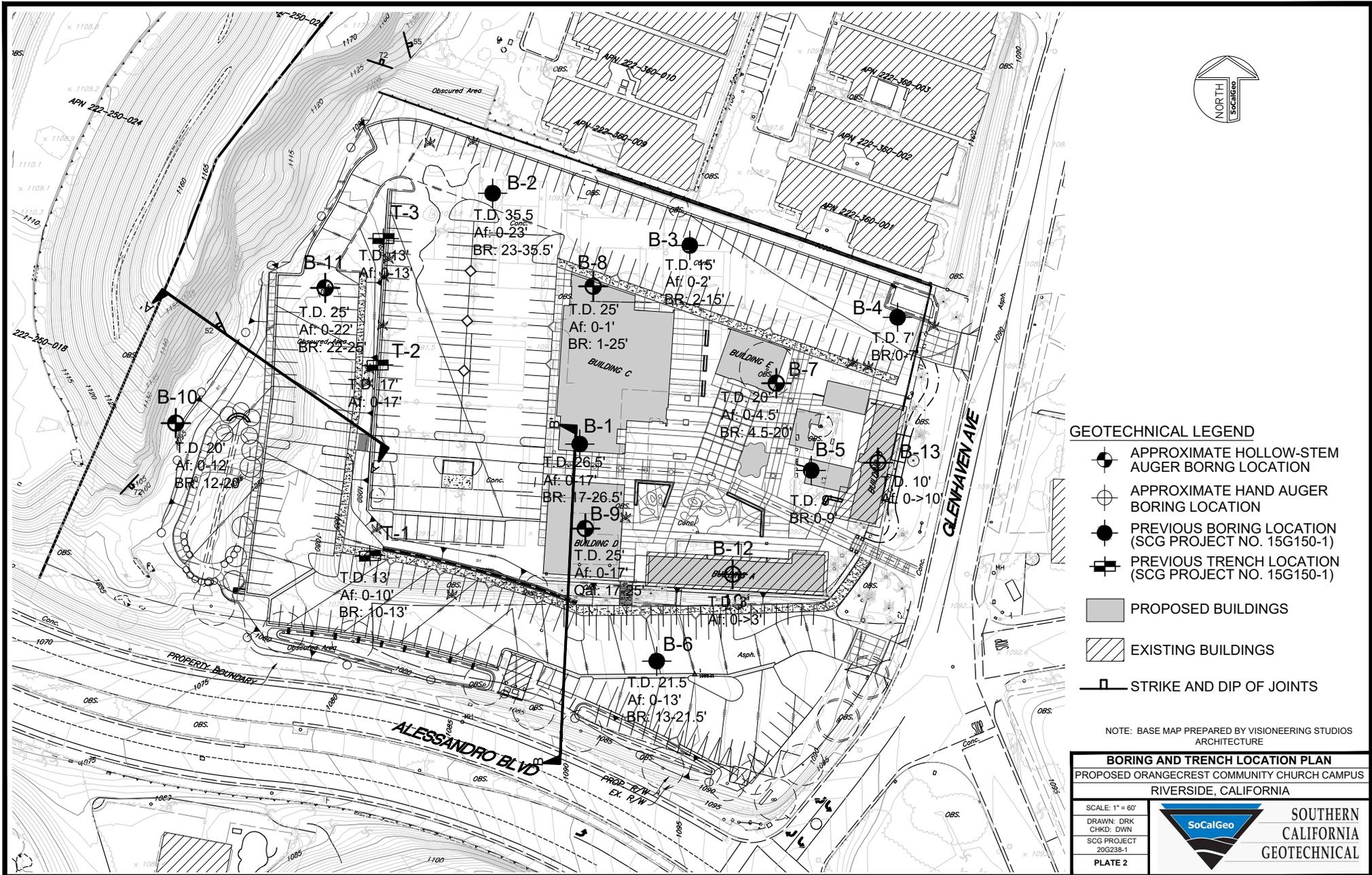
Source: KWC ENGINEERS

EXHIBIT 7: Preliminary Grading Plan
Orangecrest Community Church

K:\RIV_GIS\195272001- Orangecrest Church\7 Preliminary Grading Plan.mxd



Kimley»Horn



GEOTECHNICAL LEGEND

- APPROXIMATE HOLLOW-STEM AUGER BORING LOCATION
- APPROXIMATE HAND AUGER BORING LOCATION
- PREVIOUS BORING LOCATION (SCG PROJECT NO. 15G150-1)
- PREVIOUS TRENCH LOCATION (SCG PROJECT NO. 15G150-1)
- PROPOSED BUILDINGS
- EXISTING BUILDINGS
- STRIKE AND DIP OF JOINTS

NOTE: BASE MAP PREPARED BY VISIONEERING STUDIOS ARCHITECTURE

BORING AND TRENCH LOCATION PLAN	
PROPOSED ORANGECREST COMMUNITY CHURCH CAMPUS RIVERSIDE, CALIFORNIA	
SCALE: 1" = 60'	 SOUTHERN CALIFORNIA GEOTECHNICAL
DRAWN: DRK	
CHKD: DWN	
SCG PROJECT 20G238-1	
PLATE 2	

Source: Visioneering Studios Architecture
EXHIBIT 8: Boring and Trenching Location Plan
 Orangecrest Community Church

8. GREENHOUSE GAS EMISSIONS.

Would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

8a. Response: (Source: GHG Analysis prepared by Kimley-Horn, October 2020)

Less than Significant Impact Addressing greenhouse gas (GHG) emissions generation impacts requires an agency to determine what constitutes a significant impact. The CEQA Guidelines specifically allow lead agencies to determine thresholds of significance that illustrate the extent of an impact and are a basis from which to apply mitigation measures. This means that each agency is left to determine whether a project’s GHG emissions would have a “significant” impact on the environment. The guidelines direct that agencies are to use “careful judgment” and “make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate” the project’s GHG emissions (14 CRC §15064.4(a)).

The South Coast Air Quality Management District (SCAQMD) formed a GHG CEQA Significance Threshold Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. As of the last Working Group meeting (Meeting 15) held in September 2010, the SCAQMD is proposing to adopt a tiered approach for evaluating GHG emissions for development projects where SCAQMD is not the lead agency.

With the tiered approach, a project is compared with the requirements of each tier sequentially and would not result in a significant impact if it complies with any tier. Tier 1 excludes projects that are specifically exempt from SB 97 from resulting in a significant impact. Tier 2 excludes projects that are consistent with a GHG reduction plan that has a certified final CEQA document and complies with AB 32 GHG reduction goals. Tier 3 excludes projects with annual emissions lower than a screening threshold. The SCAQMD is proposing a screening threshold of 10,000 metric tons of CO₂ equivalent (MTCO_{2e}) per year for industrial projects and 3,000 MTCO_{2e} for non-industrial projects. SCAQMD concluded that projects with emissions less than the screening threshold would not result in a significant cumulative impact. Tier 4 consists of three decision tree options. Under the Tier 4 first option, SCAQMD initially outlined that a project would be excluded if design features or mitigation measures resulted in emissions 30 percent lower than business as usual emissions. However, the Working Group did not provide a recommendation for this approach. The Working Group folded the Tier 4 second option into the third option. Under the Tier 4 third option, a project would be excluded if it was below an efficiency-based threshold of 4.8 MTCO_{2e} per service population per year or 3.0 MTCO_{2e} per service population per year for projects opening after 2020. Tier 5 would exclude projects that implement off-site mitigation (GHG reduction projects) or purchase offsets to reduce GHG emission impacts to less than the proposed screening level.

As the Project involves the construction of a church, the 3,000 MTCO_{2e} per year non-industrial screening threshold has been selected as the significance threshold, as it is most applicable to the proposed Project.

Short-Term Construction GHG Emissions

The Project would result in direct emissions of GHGs from construction. The approximate quantity of daily GHG emissions generated by construction equipment utilized to build the Project is depicted in the **Table 10, Construction GHG Emissions**, below.

Table 10: Construction GHG Emissions

Category	CO _{2e} Emissions, metric tons/year
Total Construction Emissions	596.3
Emissions amortized over 30 years	19.88

Source: CalEEMod version 2016.3.2. Refer to Appendix A, of the Initial Study for model outputs.

As shown, the Project would result in the generation of approximately 596.3 MTCO_{2e} over the course of construction. Construction GHG emissions are typically summed and amortized over the lifetime of the Project (assumed to be 30 years), then added to the operational emissions. The amortized Project construction emissions would be 19.88 MTCO_{2e} per year. Once construction is complete, the generation of these GHG emissions would cease.

Long-Term Operational GHG Emissions

Operational or long-term emissions occur over the life of the Project. GHG emissions would result from direct emissions such as Project generated vehicular traffic, on-site combustion of natural gas, and operation of any landscaping equipment. Operational GHG emissions would also result from indirect sources, such as off-site generation of electrical power, the energy required to convey water to, and wastewater from the Project, the emissions associated with solid waste generated from the Project, and any fugitive refrigerants from air conditioning or refrigerators.

Table 11: Operational GHG Emissions

Emissions Source	CO ₂ e Emissions, metric tons/year
Area	< 0.01
Energy	156.43
Mobile	173.67
Waste	57.16
Water	28.21
Amortized Construction Emissions	19.88
Total Annual Project GHG Emissions	435.35
Threshold	3,000
Exceeds Threshold?	No

Source: CalEEMod version 2016.3.2. Refer to Appendix A for model outputs.

Total GHG emissions associated with the Project are summarized in **Table 11, Operational GHG Emissions**, above. Although the majority of vehicle trips will be generated on Sunday, the church will occasionally be open throughout the week for church-related functions and ministries, therefore, to be conservative, the maximum number of Sunday trips have been applied to everyday of the week. As shown, Project operations would generate approximately 435.35 MTCO₂e annually from operations of the Project-related GHG emissions. Therefore, the proposed Project's total GHG emissions would not exceed the threshold of 3,000 MT CO₂e/year and thus would result in a **less than significant impact**.

b. Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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8b. Response: (Source: Kimley-Horn, October 2020)

Less than Significant Impact. The SCAQMD supports State, federal, and international policies to reduce levels of ozone-depleting gases through its Global Warming Policy and rules, and the proposed Project would comply with the SCAQMD's interim GHG threshold. The proposed Project would comply with the City's General Plan policies and State Building Code provisions designed to reduce GHG emissions. In addition, the proposed Project would comply with all SCAQMD applicable rules and regulations during construction of the operational phase. As indicated above, Project emissions would not exceed the 3,000 MTCO₂e threshold, and therefore it would not interfere with the State's goals of reducing GHG emission to 1990 levels by the year 2020 as stated in AB 32 and an 80 percent reduction in GHG emissions below 1990 levels by 2050 as stated in Executive Order S-3-05. Therefore, the Project would not conflict with any applicable plan, policy or regulation related to the reduction in the emissions of GHG and thus a **less than significant impact** will occur directly, indirectly and cumulatively in this regard.

9. HAZARDS & HAZARDOUS MATERIALS.

Would the project:

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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9a. Response: (Source: General Plan 2025 Public Safety Element, GP 2025 FPEIR, California Health and Safety Code, Title 49 of the Code of Federal Regulations, California Building Code, Riverside Fire Department EOP,

2002 and Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1, OEM's Strategic Plan, Department of Toxic Substances Control (DTSC) EnviroStor), Terracon, June 2015, Phase I Environmental Site Assessment (ESA).

Less than Significant Impact

Short-Term Construction

Both the U. S. Environmental Protection Agency (U.S. EPA) and the U.S. Department of Transportation (DOT) regulate the transport of hazardous waste and material, including transport via highway. The U.S. EPA administers permitting, tracking, reporting, and operations requirements established by the Resource Conservation and Recovery Act. The DOT regulates the transportation of hazardous materials through enforcement of the Hazardous Materials Transportation Act. This act includes requirements for container design and labeling, as well as for driver training. The established regulations are intended to track and manage the safe interstate transportation of hazardous materials and waste. Additionally, State and local agencies enforce the application of these acts and coordinate safety and mitigation responses in the case that accidents involving hazardous materials occur.

Project construction activities may include refueling and minor maintenance of construction equipment on-site, which could lead to minor fuel and oil spills. The use and handling of hazardous materials during construction would occur in accordance with applicable federal, State, and local laws, including California Division of Occupational Safety and Health (Cal/OSHA) requirements. However, all construction activities would be subject to the NPDES permit process that requires the preparation of a Stormwater Pollution Prevention Plan (SWPPP), which would be reviewed and approved by the Santa Ana RWQCB, and the latest industry BMPs. Additionally, the Project site is not included on the list of hazardous waste sites (Cortese List) compiled by the Department of Toxic Substances Control (DTSC) pursuant to Government Code §65962.5, and therefore is not anticipated to release hazardous materials due to ground-disturbing activities.

According to the ESA findings, the site was developed by 1961 and the surrounding residential properties were developed in the mid-1960's. Because of the age of the Project site buildings, there is a possibility that potentially hazardous buildings materials such as asbestos-containing materials (ACM), lead-based paint (LBP), or polychlorinated biphenyls (PCBs) may be encountered during demolition of these structures. However, the proposed Project will not demolish the existing buildings. These will be renovated in place. ACMs are natural fibers used in the manufacturing of many building materials; however, they were mostly banned (in building materials) in the 1970s. Lead-based paint is considered a potential health risk and was frequently used in homes before the 1970s. PCBs were banned for commercial use in 1979, and are typically associated with materials such as fluorescent lights, electrical transformers, and power lines.

Electrical Transformers/PCBs

During the site visit, one pole-mounted transformer, owned and serviced by the City of Riverside, was observed on the south portion of the site; however, no information with regard to PCB content of the transformer fluids was observed. Transformers contain mineral oil which may contain minor amounts of PCB and could be considered " PCB contaminated" (PCB content of 50 -500 ppm). The City of Riverside maintains responsibility for the transformers, and if the transformers were "PCB contaminated," the utility company is not required to replace the transformer fluids until a release is identified. However, no evidence of current or prior release was observed in the vicinity of the electrical equipment during the site reconnaissance. Based on site observations, *the pole-mounted transformer does not constitute a Recognized Environmental Concern (REC).*

Releases or Potential Releases

Trash and debris were observed throughout the northern and western portions of the site during the site reconnaissance. Based on visual observation (only of surface materials), approximately two cubic yards of debris, which consisted of concrete rubble, polyvinyl chloride (PVC) piping, wood, and gardening pots were observed. Leakage, spills or other releases from these materials were not observed during the visual reconnaissance. The debris materials did not appear to be hazardous in nature. Based on site observations, *the two cubic yards of trash and debris does not constitute a REC.*

Other Notable Site Features

Evidence of two historical swimming pools was observed on the central east and southern portion of the site. The two pools were observed to be filled with soil. The pools were demolished in 2011 and back filled with soils from the western portion of the site and off-site soils. Source of the off-site soils is unknown. Staining and /or odors were not observed within the pool area. Three approximately six-inch circular patches were observed in the vicinity of the historical pool on the central-eastern portion of the site. It is unknown the nature of the circular patches. Based on the location of the circular patches and proximity to the former swimming pool, *indication of RECs was not identified.*

The existing structures within the Project site could contain hazardous materials. According to the ESA, the presence of undocumented fill was observed on the northern, central, southern, and western portions of the site to a depth of as much as 23 feet below grade surface (bgs). The fill was detected at the greatest depths on the southern and western portions of the site. In addition, a total of six soil borings at depths ranging from one to 23 feet bgs and, a total of three test pits at depths ranging from seven to 35 feet bgs were observed in prior reports in June 2004. Trace concrete fragments, asphaltic concrete fragments, and wood chips were observed in soil borings located on the central and northern portion of the site. Some odorous iron oxide staining were observed at depths ranging from one to 21 feet bgs in the soil borings located on the eastern portion of the site. Debris included concrete, brick, wood, asphalt, and rebar were observed in test pits located on the west portion of the site.

If ACM or LBP is present on-site, removal of these materials from the Project site would be conducted by contractors licensed and permitted to handle these materials in accordance with all applicable federal, state, and local regulations. Therefore, short-term construction impacts associated with the handling of hazardous materials would be **less than significant.**

Long-Term Operational Impacts

Refer to the Project Description for facility operations. Operations will include a youth ministry. Operations would be supported by six full-time employees and seven part-time employees. Project operations could result in the use, storage, and disposal of hazardous materials. These can include, but are not limited to paint solvents, pesticides and fertilizers, and maintenance supplies and equipment (e.g., drain cleaners, floor stripping products, paints, oils, fuels). The DTSC does not identify the Project site as a hazardous site. The nearest recorded hazardous occurrence is at the California School for the Deaf located at 3044 Horace Street. This site is located approximately 0.9-mile northwest of the site and has been designated as a “No Further Action” site. With oversight by the appropriate Federal, State, and local agencies, and compliance by the new development with applicable regulations related to the handling, storage and disposal of hazardous materials will cause the Project to have a **less than significant impact** directly, indirectly and cumulatively.

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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9b. Response: (Source: General Plan 2025 Public Safety Element, GP 2025 FPEIR Tables 5.7 A – D, California Health and Safety Code, Title 49 of the Code of Federal Regulations, California Building Code, City of Riverside’s EOP, 2002 and Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1, OEM’s Strategic Plan and Terracon, June 2015, Phase I Environmental Site Assessment.)

Less than Significant Impact with Mitigation Incorporated. As identified in Threshold 9(a), above, handling, storing, or dispensing activities associated with hazardous or potentially materials would comply with all applicable federal, state, and local agencies and regulations. Adherence with the applicable policies and programs of these agencies will ensure that any interaction with hazardous materials would occur in the safest possible manner, reducing the opportunity for the accidental release of hazardous materials into the environment. Any handling of hazardous materials will be limited in both quantities and concentrations. As mandated by the U.S. Occupational Safety and Health Administration (OSHA), all hazardous materials stored on-site will be accompanied by a Material Safety Data Sheet, which, in the case of accidental release, will inform on-site personnel as to the necessary remediation procedures. Because the existing structures will not be demolished, but rather renovated in place, the possibility for ACM and LMP is minimal. Therefore, the Project would have a **less than significant impact.**

<p>c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>9c. Response: (Source: General Plan 2025 Public Safety and Education Elements, GP 2025 FPEIR Table 5.7-D - CalARP RMP Facilities in the Project Area, Figure 5.13-2 – RUSD Boundaries, Table 5.13-D RUSD Schools, Figure 5.13-3 AUSD Boundaries, Table 5.13-E AUSD Schools, Figure 5.13-4 – Other School District Boundaries, California Health and Safety Code, Title 49 of the Code of Federal Regulations, California Building Code)</p> <p>No Impact. The proposed church Project does not anticipate emitting hazardous emission or handling of any hazardous materials, substances or waste, aside from those identified in Threshold 9(a), above. No schools are located within one-quarter mile of the Project site. The closest school to the Project site is Immanuel Lutheran Elementary School located 0.25-mile northwest at 5455 Alessandro Boulevard. Considering that the existing use of the site which has not historically handled hazardous materials, that the site is not in a hazardous list site, as noted below, and because the proposed Project is not a use that will handle hazardous materials, it is anticipated that the Project will have a less than significant impact regarding emitting hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school directly, indirectly or cumulatively.</p>				
<p>d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>9d. Response: (Source: General Plan 2025 Figure PS-5 – Hazardous Waste Sites, GP 2025 FPEIR Tables 5.7-A – CERCLIS Facility Information, Figure 5.7-B – Regulated Facilities in TRI Information and 5.7-C – DTSC EnviroStor Database Listed Sites)</p> <p>No Impact. A review of hazardous materials site lists compiled pursuant to Government Code §65962.5 found that the Project site is not included on any such lists. Therefore, the Project would have no impact to creating any significant hazard to the public or environment directly, indirectly or cumulatively.</p>				
<p>e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>9e. Response: (Source: General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas, RCALUCP and March Air Reserve Base/March Inland Port Comprehensive Land Use Plan (1999), General Plan 2025 Program FPEIR Figure 5.7-2.)</p> <p>No Impact. The Project site is not located within a public or private use airport land use plan. The closest public airports to the project site are the Riverside Municipal Airport and Flabob Airport, located approximately 5.0 miles west and 4.0 miles northwest, respectively. The airports are more than two miles from the Project site. However, the Project site is located within the March Air Reserve Base/March Inland Port Comprehensive Land Use Plan. The March Air Reserve Base is a military airport located approximately 5 miles from the site. The Project is located within Zone E “Other Airport Environs Area” of the Airport’s Land Use Compatibility Plan. This designation indicates low noise impacts, and a low risk level (RCALUC 2014). Thus, impacts associated with this airport would be unlikely. As noted on Figure PS-6, Airport Land Use Compatibility Zones and Influence Areas of the Public Safety Element, the proposed Project is located outside of the Riverside Municipal Airport and Flabob Airport.</p> <p>Because the Project is not located within two miles or an airport and because noise is not anticipated to impact the Project site, the Project would not create a safety hazard to the people residing or working in the Project area, and no impacts would occur.</p>				
<p>f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

9f. Response: (Source: GP 2025 FPEIR Chapter 7.5.7 – Hazards and Hazardous Materials, City of Riverside’s EOP, 2002 and Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1, and OEM’s Strategic Plan, General Plan 2025 Figure PS 8.1 – Evacuation Routes)

Less than Significant Impact. The Project will be served by existing, fully improved streets, Alessandro Boulevard and Glenhaven Avenue, as well as a network of local streets. Figure 8.1 of the General Plan designates specific arterial streets, bridges, freeways, and streets as evacuation routes; this includes Alessandro Boulevard which is an arterial. The proposed Project would ensure that the minimum right-of-way widths on City streets would be maintained, which would continue to ensure that Alessandro Boulevard is accessible to the general public, emergency personnel, and residents. Individual Project review by the City including the Riverside Fire Department (RFD) would also be required.

The Project would not interfere with the City’s Emergency Operations Plan (EOP) because it does not contain any features that would prohibit the execution of such plans. The Project would provide access via Glenhaven Avenue and would contain adequate access and circulation for emergency equipment on-site. Evaluation and approval of the proposed site plan by the RFD would be required to ensure adequacy of emergency access. Thus, impacts to an emergency response plan would be **less than significant**.

g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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9g. Response: (Source: General Plan 2025 Figure PS-7 – Fire Hazard Areas, GIS Map Layer VHFSZ 2010, City of Riverside’s EOP, 2002, Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1/Part 2 and OEM’s Strategic Plan, CalFire FHSZ Viewer at <https://egis.fire.ca.gov/FHSZ/>)

No Impact. The proposed Project is located in an urbanized area where no wildlands exist within the property. According to CalFire, the Project site is not located within a Very High Fire Severity Zone (VHFSZ) or adjacent to wildland areas or a VHFSZ; therefore, **no impact** regarding wildland fires either directly, indirectly or cumulatively from this Project will occur.

10. HYDROLOGY AND WATER QUALITY.

Would the project:

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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10a.Response: (Source: GP 2025 FPEIR Table 5.8-A – Beneficial Uses Receiving Water, 2015 Urban Water Management Plan, Water Quality Management Plan prepared by KWC Engineers dated June 1, 2020 and provided as Appendix G)

Short-Term Construction Impacts

Less than Significant Impact. The State of California is authorized to administer various aspects of the NPDES Construction General Permit. The Construction General Permit requires developments of one-acre or more to reduce or eliminate non-stormwater discharges into stormwater systems, and to develop and implement a SWPPP. Since the Project site is more than one acre (5.27 acres) in area, a SWPPP will be required. The Project will implement a SWPPP to comply with the Construction General Permit requirements. Appropriate structural and non-structural BMPs will also be required to be implemented during Project construction. Some of the BMPs the Project shall be required to implement include the following:

- On-site Storm Drain Inlet Control. Employ measures to maintain and periodically repaint or replace inlet markings.
- Landscape/Outdoor Pesticide Use Control. Employ features to maintain landscape pesticide use to a minimum or no use level.
- Sidewalks and Parking Lot Maintenance. Employ measures to sweep sidewalks and parking lots regularly to prevent accumulation of litter and debris.

- Other Reasonable BMPs. The Project must also implement other applicable BMPs as needed to keep pollutants away from stormwater. The Project must also identify additional applicable measures taken during the storm season and when storms are anticipated.

These BMPs have demonstrated through years of field testing and field use to reduce construction runoff impacts to less than significant levels. Based on the various regulatory requirements, potential short-term construction impacts would be considered **less than significant**.

Long-Term Operation Impacts

Less than Significant Impact. The water quality management plan (WQMP) is a post-construction management program that ensures the ongoing protection of the watershed basin by requiring structural and programmatic controls. The WQMP identifies structural controls (including a contained, on-site wastewater treatment plant) and programmatic controls to minimize, prevent, and/or otherwise appropriately treat stormwater runoff flows before they are discharged from the site. Mandatory compliance with the WQMP would ensure that the proposed Project does not violate any water quality standards or waste discharge requirements during long-term operation. In order to minimize pollutants of concern in stormwater discharges from the Project site, site design BMPs and source control BMPs will be included as part of the Project, according to the WQMP, recommendations are noted below in **Table 12, Permanent and Operational Source Control BMP Measures**.

Table 12: Permanent and Operational Source Control BMP Measures

Potential Sources of Runoff Pollutants	Permanent Structural Source Control BMPs	Operational Source Control BMPs	Responsible Party(s)
On-site Storm Drain Inlets	Mark all inlets with the words “Only Rain Down the Storm Drain” or similar. Catch Basin Markers shall be per local agency requirements.	<ul style="list-style-type: none"> • Maintain and periodically repaint or replace inlet markings. • Provide Stormwater pollution prevention information to new site owners, lessees, or operators. • See applicable operational BMPs in Fact Sheet SC-44, “Drainage System Maintenance,” in the CASQA <p>Stormwater Quality Handbooks at www.cabmphandbooks.com</p> <p>Include the following in lease agreements: “Tenant shall not allow anyone to discharge anything to storm drains or to store or deposit materials so as to create a potential discharge to storm drains.”</p>	Owner
Landscape/Outdoor Pesticide Use	<p>Final landscape plans will accomplish all of the following:</p> <ul style="list-style-type: none"> • Preserve existing native trees, shrubs, and ground cover to the maximum extent possible. • Design landscaping to minimize irrigation and runoff, to promote surface infiltration where appropriate, and to minimize the use of fertilizers and pesticides that can contribute to stormwater pollution. 	<ul style="list-style-type: none"> • Maintain landscaping using minimum or no pesticides. • See applicable operational BMPs in “What you should know for Landscape and Gardening” at http://rcflood.org/stormwater <p>Provide IPM information to new owners, lessees and operators.</p>	Owner

	<ul style="list-style-type: none"> Where landscaped areas are used to retain or detain stormwater, specify plants that are tolerant of saturated soil conditions. Consider using pest-resistant plants, especially adjacent to hardscape. <p>To insure successful establishment, select plants appropriate to site soils, slopes, climate, sun, wind, rain, land use, air movement, ecological consistency, and plant interactions.</p>		
Pools, spas, ponds, decorative fountains, and other water features.		<ul style="list-style-type: none"> See applicable operational BMPs in "Guidelines for Maintaining Your Swimming Pool, Jacuzzi and Garden Fountain" at http://rcflood.org/stormwater/ 	Owner
Plazas, sidewalks, and parking lots.		<ul style="list-style-type: none"> Sweep plazas, sidewalks, and parking lots regularly to prevent accumulation of litter and debris. Collect debris from pressure washing to prevent entry into the storm drain system. Collect wash water containing any cleaning agent or degreaser and discharge to the sanitary sewer not to a storm drain. 	Owner

The inclusion of BMPs as well as the provision of other post-construction stormwater BMPs would mitigate the impacts associated with stormwater runoff to levels deemed acceptable by both Santa Ana RWQCB and the City of Riverside. Therefore, potential impacts would be **less than significant**.

b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

10b.Response: (Source: General Plan 2025 Table PF-1 – RPU Projected Domestic Water Supply (AC-FT/YR), Table PF-2 – RPU Projected Water Demand, RPU Map of Water Supply Basins, RPU Urban Water Management Plan, 2015 Urban Water Management Plan)

Groundwater Supplies

Less than Significant Impact. According to the Riverside Public Utilities (RPU) Service’s 2015 Urban Water Management Plan (UWMP), the City of Riverside depends on groundwater from the Bunker Hill Basin, Rialto-Colton Basin, Riverside Basin, and Arlington Basin. The UWMP contains existing and projected water supplies and demands for the City of Riverside during normal and dry-year scenarios. **Table 13, Projected Multiple-Dry Year Supplies and Demands (afy)**, provides projected multiple-dry year supplies and demands, which represent water supplies and demands during extended periods of drought conditions when supplies would be reduced.

Table 13: Projected Multiple-Dry Year Supplies and Demands (afy)

Year	Totals	2020	2025	2030	2035	2040
First Year	Supply Totals	102,364	107,364	110,164	110,164	110,164
	Demand Totals	95,221	96,534	99,015	101,589	104,257
	Difference	7,143	10,830	11,149	8,575	5,907
Second Year	Supply Totals	102,364	107,364	110,164	110,164	110,164
	Demand Totals	95,221	96,534	99,015	101,589	104,257
	Difference	7,143	10,830	11,149	8,575	5,907

Third Year	Supply Totals	102,364	107,364	110,164	110,164	110,164
	Demand Totals	95,221	96,534	99,015	101,589	104,257
	Difference	7,143	10,830	11,149	8,575	5,907

Source: City of Riverside RPU. 2015. *Urban Water Management Plan. Table 8-4. DWR Table 7-4R. Multiple Dry Years Supply and Demand Comparison.* June 2016. https://www.riversideca.gov/utilities/pdf/2016/RPU_2015_UWMP_June_Draft.pdf. Accessed November 6, 2020.

According to Table 13, the City anticipates having sufficient water source for multiple-dry years. Additionally, Table PF-2 RPU Projected Water Demands, of the Public Facilities and Infrastructure Element, has projected water demand through year 2030 by water use sector. Since the proposed project is not one of the major sectors noted in Table PF-2, it is assumed that it forms part of the “Other” sector which is estimated a water demand of 499 acre-feet per year (afy). Because the General Plan elements and UWMP are updated periodically and feed off each other, it is presumed that the project site’s water demand is account for in RPU’s project water demand. The proposed project is anticipated to require considerably less water than if the former use was operational which, for a facility of that type (swim and tennis club), water use would be substantial.

Therefore, as shown in Table 13, the Project’s water usage would represent only a nominal percentage of projected surplus (projected supply minus project demand) for the multiple dry year scenarios (conservative). Therefore, impacts associated with groundwater supplies would be less than significant.

Groundwater Recharge

Less than Significant Impact. The Project site is currently gently sloping, and runoff onsite drains as sheet flow towards the southwest direction. The site elevation ranges from 890 to 1,265 feet throughout the site. The Project site does not contain any discernable streams, rivers, but does contain a natural drainage feature on the south portion of the site along Alessandro Boulevard. The proposed improvements will not significantly alter the existing drainage pattern of the site.

The proposed Project includes three bio-retention basins. The runoff from the proposed site will be collected by gutters, swales, and an on-site storm drain system. Most of the runoff from drive aisle and parking lot areas will be collected and diverted into the bio-retention basins that will treat stormwater. Outflow from the basins will ultimately discharge into the existing Master Planned 48-inch storm drain line “F” (Victoria Avenue Storm Drain) in Alessandro Boulevard.

The Project site will implement BMPs to reduce the accumulation of litter and debris, to minimize the use of pesticides, and to collect and dispose of any wash-water to the sanitary sewer. In addition, the imposition of BMPs would ensure that federal and state water quality standards will not be violated and are considered less than significant without mitigation. Because the Project would continue to recharge groundwater basins and because the City has plenty of water resources and the Project is not anticipated to limit recharge, the Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Additionally, the inclusion of the BMPs will maintain impacts to the existing drainage pattern of the site or area to a level of **less than significant**.

c. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i. Result in substantial erosion or siltation on-or-off-site?				

10i Response: (Source: Preliminary grading plan)

Less than Significant Impact. The Project site is currently gently sloping, and runoff on-site drains as sheet flow towards the southwest direction. The site elevation ranges from 890 to 1,265 above mean sea level (AMSL) throughout the site. The Project site does not contain any discernable streams, rivers, or other drainage features aside from the southern drainage. The proposed improvements will not significantly alter the drainage pattern of the existing site as an infiltration basin will be placed to continue to capture water; refer to **Exhibit 9, Preliminary WQMP Exhibit.**

Additionally, the Project will implement BMPs to reduce the accumulation of litter and debris, to minimize the use of pesticides, and to collect and dispose of any washwater to the sanitary sewer. In addition, the imposition of BMPs ensure that federal and state water quality standards will not be violated and are considered less than significant without mitigation. The inclusion of the aforementioned BMPs will maintain impacts to the existing drainage pattern of the site or area to a level of **less than significant.**

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or-off-site?

10ii. Response: (Source: Preliminary grading plan, FEMA Flood Map Service, Map 06065C0728G (08/28/2008), Preliminary WQMP, prepared by KWC Engineers on June 1, 2020.)

Less than Significant Impact. According to the above reference FEMA Flood Map, the Project site is designated as a Zone X (unshaded) which FEMA defines as an area of minimal flood hazard, usually depicted as above the 500-year flood level. Zone X is the area determined to be outside the 500-year flood and protected by levee from 100- year flood.

According to the WQMP, in preparation of the WQMP, the existing drainage patterns of the site were identified and preserved. The Project would maintain the existing drainage pattern which drains southwesterly to a sump. The proposed runoffs from the Delineate Drainage Management Areas (DMAs) A (located in the Project courtyard area) and C (located along the parking area to the west of Building B) will be collected by gutters, swales and on-site storm drain system then conveyed to two proposed water quality basins along Alessandro Boulevard; refer to Exhibit 8. The north part of the site will drain into the smaller basin at the northeast corner of the site, along Glenhaven Avenue. The outflows from the basins will ultimately discharge into an existing Master Planned 48-inch storm drain line "F" (Victoria Storm Drain) in Alessandro Boulevard.

Consequently, implementation of the proposed Project is not expected to increase surface runoff in a manner that would cause flooding. Moreover, according to the WQMP, the existing impervious area of 138,042-square feet would remain the same with Project implementation. Additionally, the three infiltration basins will retain and infiltrate on-site water limiting run-off.

Therefore, the proposed Project would not cause flooding, and would have a **less than significant impact.**

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

10iii. Response: (Source: Preliminary grading plan)

Less than Significant Impact. As noted in Threshold 10(c)(ii) above, the Project will fully mitigate stormwater runoff such that runoff water will not exceed that of existing conditions and is not otherwise anticipated to exceed the capacity of downstream drainage facilities through the implementation of BMPs. As discussed in Threshold 10(a) and 10(c)(ii) above, the proposed onsite retention basins, infiltration and operational BMPs will reduce impacts to **less than significant** for stormwater runoff and City Municipal Code requirements.

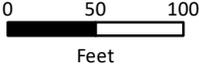
iv. Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>10iv. Response: (Source: FEMA Flood Zone Map)</p> <p>Less than Significant Impact. The proposed Project site is not located within a flood hazard area. The storm water drainage system will be installed concurrently with the construction of this Project and will be adequately sized to accommodate the drainage created by this Project. On-site storm water and non-stormwater runoff will be treated with onsite BMPs and then discharged to the existing drainage courses within the site where they extend off-site, retaining the overall drainage pattern of the site. As outlined in Threshold 10(c)(i) above, the drainage feature that crosses the southwest corner of the site and continues off-site in a northwest direction will not be impacted, but preserved in place, with implementation of the proposed Project. Therefore, the proposed Project will not impede or redirect flood flows and there will be a less than significant impact directly, indirectly or cumulatively.</p>				
v. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>10v. Response: (Source: GP 2025 FPEIR Chapter 7.5.8 – Hydrology and Water Quality)</p> <p>No Impact. Tsunamis are large waves that occur in coastal areas. With the Project’s inland location and lack of nearby water body, the Project is not anticipated to be susceptible to seiche, tsunami, or mudflow. Additionally, according to the City of Riverside General Plan’s Public Safety Element, the Project site is not within the flood hazard area. Furthermore, as previously discussed, the Project site is located within Zone X which identifies areas outside the 0.2 percent annual chance floodplain. According to FEMA’s National Flood Insurance Program, Zone X is an area of minimal flood hazard, and is an area determined to be outside the 500-year flood and protected by levee from the 100-year flood. Therefore, impacts associated with flooding, including flooding as a result of the failure of a levee or dam, seiche, tsunami, or mudflow would not occur.</p>				
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>10e. Response: (Source:)</p> <p>Less than Significant Impact. Refer to Threshold 10(b) above.</p>				



Source: KWC ENGINEERS

EXHIBIT 9: Preliminary WQMP Exhibit
Orangecrest Community Church

\\r\p01\CA_RIV1\RIV_GIS\195272001- Orangecrest Church\8 Preliminary WQMP Exhibit.mxd



11. LAND USE AND PLANNING:				
Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
11a. Response: (Source: General Plan 2025 Land Use and Urban Design Element, Project site plan, City of Riverside GIS/CADME map layers) Less than Significant Impact. The Project site is currently developed with two empty buildings, eight tennis courts, and a parking lot along the site frontage. The proposed Project has a General Plan designation of LDR - Low Density Residential and a Zoning of R-1-13000 Single Family Residential which allows the proposed Project with a Conditional Use Permit (CUP). As such, the proposed Project is consistent with the development of the surrounding area providing adequate access, circulation and connectivity consistent with the General Plan 2025, and in compliance with the requirements of the Zoning and Subdivision Codes. Additionally, implementation of the Project would improve the site's current run-down condition which would improve the overall character of the area. As such, the Project would be consistent with Policy LU-85.2 in the Land Use and Urban Design Element of the General Plan 2025. Therefore, the Project impacts related to the community are less than significant .				
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
11b. Response: (Source: General Plan 2025, General Plan 2025 Figure LU-10 – Land Use Policy Map, Table LU-1 – Neighborhoods and Neighborhood Plans, Table LU-5 – Zoning/General Plan Consistency Matrix, Title 19 – Zoning Code) Less than Significant Impact. The City of Riverside General Plan's Land Use and Urban Design Element Map has designated the Project site as LDR - Low Density Residential and zoned the site as R-1-1-13000 Single Family Residential. The Project would require a CUP to allow the development of a place of worship. With approval of the CUP, the Project would not conflict with the adopted General Plan and Zoning. Additionally, the existing buildings are not of historical significance and no historical resources are anticipated to be impacted. Therefore, the Project impacts would be less than significant .				
12. MINERAL RESOURCES.				
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
12a. Response: (Source: General Plan 2025 Figure – OS-1 – Mineral Resources, Figure 5.10-1, Mineral Resources of the GP 2025 FPEIR, Southern California Geotechnical Inc – Geotechnical Feasibility Study) Less than Significant Impact. The Project site is not identified by the City of Riverside's Zoning Map as a mineral recovery site. However, the Project site is identified by the City of Riverside General Plan's Mineral Resource Map as Mineral Resource Zone (MRZ-3). The MRZ-3 classification indicates that the area contains known or inferred mineral occurrences of undermined resource significance. According to the City's General Plan Open Space/Conservation Elements, the Project site contains limestone mineral resources. The Project site is located within an existing urban area that has minimal accessibility for mining. The geological study prepared by SoCalGeo (2015) determined that although the site was utilized for approximately 20 years for mining granitic bedrock material, the Project site has since then been developed with a swim and tennis club around 1966. Currently, there is no active mining occurring on site or in the vicinity. Therefore, the impacts to known mineral resources are less than significant directly, indirectly and cumulatively.				
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
12b. Response: (Source: General Plan 2025 Figure – OS-1 – Mineral Resources) No Impact. Refer to Threshold 12(b) above. The Project site does not serve as an active mining site, nor does the Project vicinity. No impact would occur.				

13. NOISE.

Would the project result in:

a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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13a. Response: (Source: General Plan Figure N-1 – 2003 Roadway Noise, Figure N-5 – 2025 Roadway Noise, Figure N-10 – Noise/Land Use Noise Compatibility Criteria, FPEIR Table 5.11-I – Existing and Future Noise Contour Comparison, Table 5.11-E – Interior and Exterior Noise Standards, Appendix G – Noise Existing Conditions Report, Title 7 – Noise Code, Noise Study, prepared by Kimley-Horn and Associates, dated November 2020 and provided as Appendix F, Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, Table 7-2, Page 179)

Less Than Significant Impact. The Project has the potential to expose persons to or generation of noise levels in excess of standards established in the General Plan 2025 and/or the Noise Code (Title 7). Construction would only occur during the permitted hours of 7:00 a.m. and 7:00 p.m. on weekdays and between 8:00 a.m. and 5:00 p.m. on Saturdays, no construction would occur on Sundays or Federal holidays. As such, construction noise is exempt from General Noise Regulations as described in §7.35.020-Exemptions in the City of Riverside Municipal Code. However, to be conservative this analysis used the Federal Transit Administration (FTA)’s threshold of 80 dBA (8-hour Leq) for residential uses and 85 dBA (8-hour Leq) for non-residential uses to evaluate construction noise impacts.

Following FTA’s methodology for quantitative construction noise assessments, Federal Highway Administration’s (FHWA’s) Roadway Construction Noise Model (RCNM) was used to predict construction noise at the nearest sensitive receptors (i.e., residential uses to the north). **Table 14: Project Construction Noise Levels** shows the estimated exterior construction noise levels at the nearest sensitive receptors. Following FTA methodology, when calculating construction noise, all equipment is assumed to operate at the center of the project because equipment would operate throughout the project site and not at a fixed location for extended periods of time. Therefore, the distance used in the RCNM model was 200 feet for the nearest residential property.

Table 14: Project Construction Noise Levels

Construction Phase	Modeled Exterior Construction Level at Nearest Sensitive Receptor (dBA Leq)	Noise Threshold (dBA Leq)	Exceed Threshold?
Demolition	74.4	80.0	No
Site Preparation	75.6	80.0	No
Grading	75.2	80.0	No
Construction/Paving/Painting	77.0	80.0	No

Source: Refer to Appendix A of the Noise Report, provided as Appendix F of the Initial Study, for construction noise modeling assumptions and results.

As indicated in **Table 14**, project construction noise would not exceed the FTA noise threshold for residential uses. In addition, although construction noise levels may exceed the existing ambient levels in the area, construction would be temporary and would not result in a permanent increase in ambient noise levels in the area. Project construction would also be limited to daytime hours between 7:00 a.m. and 7:00 p.m. during weekdays, 8:00 a.m. and 5:00 p.m. on Saturdays (and prohibited on Sundays and federal holidays) in compliance with Riverside City Code Section 7.35.020(G). Therefore, construction noise impacts would be less than significant.

Operational noise would not result in any significant impacts. In general, a 3-dBA increase in traffic noise is barely perceptible to people, while a 5-dBA increase is readily noticeable. Traffic volumes on Project area roadways would have to approximately double for the resulting traffic noise levels to generate a 3-dBA increase³. According to the Master Plan of Roadways (Figure CCM-4) of the Circulation Element, Alessandro Boulevard is a four-lane arterial roadway and Glenhaven Avenue is a 2-lane roadway. Since the Project would only generate a maximum of 138 daily trips, the increase is not enough to double existing traffic and traffic noise is not anticipated to increase ambient levels.

³ According to the California Department of Transportation, *Technical Noise Supplement to Traffic Noise Analysis Protocol* (September 2013), it takes a doubling of traffic to create a noticeable (i.e. 3 dBA) noise increase.

Therefore, impacts are considered **less than significant** regarding the exposure of persons to or the generation of noise levels in excess of established City standards either directly, indirectly or cumulatively.

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| b. Generation of excessive groundborne vibration or groundborne noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

13b. Response: (Source: Federal Transit Administration - Transit Noise and Vibration Impact Assessment Manual, FPEIR Table 5.11-G – Vibration Source Levels For Construction Equipment)

Less than Significant Impact. Construction related activities although short term, are the most common source of groundborne noise and vibration that could affect occupants of neighboring uses. The Federal Transit Administration (FTA) has published standard vibration velocities for construction equipment operations. In general, the FTA architectural damage criterion for continuous vibrations (i.e., 0.2 in/sec) appears to be conservative. The types of construction vibration impacts include human annoyance and building damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. Building damage can be cosmetic or structural. Ordinary buildings that are not particularly fragile would not experience any cosmetic damage (e.g., plaster cracks) at distances beyond 30 feet. This distance can vary substantially depending on the soil composition and underground geological layer between vibration source and receiver. In addition, not all buildings respond similarly to vibration generated by construction equipment. For example, for a building that is constructed with reinforced concrete with no plaster, the FTA guidelines show that a vibration level of up to 0.20 in/sec is considered safe and would not result in any construction vibration damage.

Table 15, Typical Construction Equipment Vibration Levels, below lists vibration levels for typical construction equipment at 25 feet and at 110 feet (the distance to the nearest receptor). Using the calculation shown in the table below, at 110 feet the vibration velocities from construction equipment would not exceed 0.0228 in/sec PPV, which is below the FTA’s 0.20 PPV threshold. It is also acknowledged that construction activities would occur throughout the Project site and would not be concentrated at the point closest to the nearest residential structure. Therefore, vibration impacts associated with the proposed Project would be **less than significant** directly, indirectly and cumulatively.

Table 15: Typical Construction Equipment Vibration Levels

Equipment	Peak Particle Velocity at 25 Feet (in/sec)	Peak Particle Velocity at 110 Feet (in/sec) ¹
Large Bulldozer	0.089	0.0096
Loaded Trucks	0.076	0.0082
Small Bulldozer/Tractors	0.003	0.0003
Vibratory Roller	0.210	0.0228
Jackhammer	0.035	0.0038

¹ Calculated using the following formula: $PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$
 where: PPV_{equip} = the peak particle velocity in in/sec of the equipment adjusted for the distance
 PPV_{ref} = the reference vibration level in in/sec from Table 7-4 of the Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, 2018.
 D = the distance from the equipment to the receiver

Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, 2018.

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

13c. Response: (Source: General Plan 2025 Figure N-8 – Riverside and Flabob Airport Noise Contours, Figure N-9 – March ARB Noise Contour)

No Impact. Although the Project site is located within the March Air Reserve Base/March Inland Port Comprehensive Land Use Plan, the proposed Project is not located within two miles of a public airport or public use airport and as such will have no impact on people residing or working in the Project area to excessive noise levels either directly, indirectly or cumulatively. In addition, per the GP 2025 Program FPEIR, there are no private airstrips within the City that would expose people working or residing in the City to excessive noise levels. Because the proposed Project is not located within proximity of a private airstrip, and does not propose a private airstrip, the Project will not expose people residing

or working in the City to excessive noise levels related to a private airstrip and would have no impact directly, indirectly or cumulatively.				
14. POPULATION AND HOUSING.				
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>14a. Response: (Source: <i>General Plan 2025 Table LU-3 – Land Use Designations, FPEIR Table 5.12-A – SCAG Population and Households Forecast, Table 5.12-B – General Plan Population and Employment Projections– 2025, Table 5.12-C – 2025 General Plan and SCAG Comparisons, Table 5.12-D - General Plan Housing Projections 2025, Capital Improvement Program and SCAG’s RCP and RTP</i>)</p> <p>Less than Significant Impact. Temporary labor force would be required to construct the proposed Project. The short-term nature of this temporary construction workforce would not induce substantial population growth. The Project is a religious gathering place that is anticipated to serve the existing community. The Project anticipates retaining six full-time employees and seven part-time employees. The facility would operate with hours typical of places of worship, with the primary activity occurring each Sunday for worship services. Occasional midweek gatherings and events would occur, including occasional evening events for the congregation and guests. Church classrooms are to be used when church is in service (“youth and children’s ministries”) and for occasional use throughout the week for church-related functions and ministries. The Project is not proposing housing. As such, the Project would not result in new impacts beyond those previously evaluated in the GP 2025 FPEIR; therefore, the impacts will be less than significant both directly and indirectly.</p>				
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>14b. Response: (Source: <i>CADME Land Use 2003 Layer, photos from site visit, Google imaging</i>)</p> <p>No Impact. The Project site does not contain any housing and no housing or people would be displaced. Therefore, there will be no impact on existing housing either directly, indirectly or cumulatively.</p>				
15. PUBLIC SERVICES.				
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>15a. Response: (Source: <i>FPEIR Table 5.13-B – Fire Station Locations, Table 5.13-C – Riverside Fire Department Statistics and Ordinance 5948 § 1</i>)</p> <p>Less than Significant Impact. Refer to Response 9(g), Hazards and Hazardous Materials. The Project is a church facility providing local services to the immediate community by providing a religious gathering space with other associated amenities. As shown on Figure PS-7 – Fire Hazard Areas, of the General Plan 2025, the Project is not located within a Very High, High, or Moderate Fire Severity Zone nor is it located adjacent to wildland areas.</p> <p>Adequate fire facilities and services are provided by Fire Station #3 located 6395 Riverside Avenue, Fire Station #9 located at 6674 Alessandro Boulevard, and Fire Station #14 located at 725 Central Avenue. All three-fire station are located within a 2.0-mile radius. The RFD’s Operations Division responds to more than 25,000 calls annually. The average on-site response to fire calls is five minutes and 30 seconds. Delivering and maintaining such a high level of service in the future as the City grows is a major concern to the RFD. The City’s Fire Department’s goal is to maintain a 5-minute response time for the first arriving units, 90 percent of the time for all Emergency Medical Services (EMS) and fire related incidents. As of 2013, the Fire Department arrives within seven minutes of dispatch over 70 percent</p>				

of the time. The first arriving unit is capable of advancing the first line for fire control, initiating rescue, or providing basic life support for medical incidents. Additionally, the City's Fire Department policy states that units will be located and staffed such that an effective response force of four units with twelve personnel minimum shall be available to all areas of the City within a maximum of ten minutes (total response time).

Because of the nature of the existing site, compared to the proposed Project, it is anticipated that the proposed Project could generate more calls or need for fire protection services than what is currently provided to the site. However, it should be noted that the proposed Project would not be located within a VHFSZ. Additionally, the proposed Project will be constructed pursuant to the latest California Fire Code as adopted and amended by the City of Riverside. In addition, with implementation of General Plan 2025 policies, compliance with existing codes and standards, and through Fire Department practices, there will be **less than significant impacts** on the demand for additional fire facilities or services either directly, indirectly or cumulatively.

b. Police protection?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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15b. Response: (Source: General Plan 2025 Figure PS-8 – Neighborhood Policing Centers)

Less than Significant Impact. Adequate police facilities and services are provided by the Riverside Police Department (RPD) which operates from three major facilities. The RPD currently employs 394 sworn officers and 236 civilian personnel. As part of the Riverside Renaissance Initiative, a new Public Safety Administration building, 911 Dispatch and Data Center and a Neighborhood Policing Center are proposed. Additional police facilities are located throughout the City. Incoming calls requesting police services are assigned by urgency. Priority 1 calls are typically of a life-threatening nature, such as a robbery in process or an accident involving bodily injury. Police officers strive to respond within 7 minutes to Priority 1 calls. Officers will respond to less-urgent Priority 2 calls within 12 minutes. These types of calls are not life threatening and include such incidents as burglary, petty theft, shoplifting, etc.

According to Figure PS-8 of the General Plan, the Orange Station, located at 4102 Orange Street, is located approximately 2.5 miles northwest of the Project site. Additionally, it is not anticipated that the Project would create population growth. The proposed Project is not expected to substantially increase the demand for police protection services as the proposed Project is not inducive to criminal activities. With the payment of the required development impact fees, which include a fee for police service impacts to offset potential demand associated with development, with implementation of General Plan 2025 policies, compliance with existing codes and standards, there will be **less than significant impacts** on the demand for additional police facilities of services either directly, indirectly or cumulatively.

c. Schools?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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15c. Response: (Source: FPEIR Figure 5.13-2 – RUSD Boundaries, Table 5.13-D – RUSD, Table 5.13-G – Student Generation for RUSD)

Less than Significant Impact. The Project site is located in the Riverside Unified School District (RUSD), which has 44 schools including 30 elementary, 1 special education pre-school, 6 middle schools, 5 comprehensive high schools, 2 continuation high schools and 1 adult alternative education school. and high schools. The closest schools to the Project site are Alcott Elementary and Riverside Poly High School, which are located 0.5-mile north.

The Project is non-residential and would not create or induce unplanned population growth to the area. With implementation of General Plan 2025 policies, compliance with existing codes and standards, and through RUSD impact fees used to offset the impact of new development, there will be **less than significant impacts** on the demand for school facilities or services either directly, indirectly or cumulatively.

d. Parks?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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15d. Response: (Source: General Plan 2025 Figure PR-1 – Parks, Open Spaces and Trails, Table PR-4 – Park and Recreation Facilities, Parks Master Plan 2003, GP 2025 FPEIR Table 5.14-A – Park and Recreation Facility Types, and Table 5.14-C – Park and Recreation Facilities Funded in the Riverside Renaissance Initiative)

<p>No Impact. The Project is a non-residential use that will not involve the addition of any housing units that could increase population. Additionally, the Project will provide 37,187 SF of additional landscape areas. Therefore, there will be no impact on the demand for additional park facilities or services either directly, indirectly or cumulatively.</p>				
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>15e. Response: (Source: General Plan 2025 Figure LU-8 – Community Facilities, FPEIR Figure 5.13-5 - Library Facilities, Figure 5.13-6 - Community Centers, Table 5.3-F – Riverside Community Centers, Table 5.13-H – Riverside Public Library Service Standards)</p> <p>No Impact. The Project consists of the development of church. Adequate fire, policing, hospital facilities are provided to serve this Project area. In addition, with implementation of General Plan 2025 policies, compliance with existing codes and standards, there will be no impacts on the demand for additional public facilities or services either directly, indirectly or cumulatively.</p>				
<p>16. RECREATION.</p>				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>16a. Response: (Source: General Plan 2025 Figure PR-1 – Parks, Open Spaces and Trails, Table PR-4 – Park and Recreation Facilities, Figure CCM-6 – Master plan of Trails and Bikeways, Parks Master Plan 2003, FPEIR Table 5.14-A – Park and Recreation Facility Types, and Table 5.14-C – Park and Recreation Facilities Funded in the Riverside Renaissance Initiative, Table 5.14-D – Inventory of Existing Community Centers, Riverside Municipal Code Chapter 16.60 - Local Park Development Fees, Bicycle Master Plan May 2007)</p> <p>No Impact. Refer to Response 15(d) above, and 16(b) below. The Project is consistent with the adopted General Plan 2025 upon the approval of a CUP to allow for the development of a place of worship also providing private open space. The Project will not require the development of additional parks as part of the Project approval. The Project could be subject to Development Impact Fees (DIF), at the discretion of the City Parks, Recreation and Community Services Department. Therefore, this Project will have a no impact directly, indirectly or cumulatively.</p>				
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>16b. Response:</p> <p>No Impact. The Project will not include new recreational facilities or require the construction or expansion of recreational facilities; therefore, there will be no impact directly, indirectly or cumulatively.</p>				
<p>17. TRANSPORTATION</p>				
<p>Existing Street System</p> <p>Regional access to the site is provided primarily by State Route 91(SR-91) and Interstate 215 (I-215), which can both be accessed via Alessandro Boulevard.</p> <p>Existing lane configurations and intersection controls at the study intersections are shown on Exhibit 10, Existing Lane Configuration and Traffic Control. A copy of the City of Riverside Circulation Plan is provided on Exhibit 11, City of Riverside Circulation Plan. The following provides a description of the roadways surrounding the Project site.</p> <p>Alessandro Boulevard – The segment of Alessandro Boulevard adjacent to the Project site is a four-lane roadway with a raised center median. On-street parking is not allowed along either side of the roadway and the posted speed limit is 40 miles per hour (mph). Class II Bike lanes are provided on both sides of the roadway. Alessandro Boulevard forms the southern boundary of the Project site and would provide vehicle access to Glenhaven Avenue where two Project driveways are located. Alessandro Boulevard is designated as an Urban Arterial on the County of Riverside Circulation Plan.</p>				

Glenhaven Avenue – The segment of Glenhaven Avenue adjacent to the Project site is a two-lane undivided roadway trending in a north-south direction. On-street parking is permitted and the posted speed limit is 25 miles per hour.

Analysis Scenario and Methodology

Analysis Scenarios

Due to Project size, the City of Riverside recommends a site access analysis and a queueing assessment for the Project driveways to be evaluated in the morning and evening peak hours for the following conditions:

- Existing Conditions
- Opening Year 2021 Cumulative (Opening Year Plus Cumulative traffic of other known developments) Plus Project

If analysis shows that improvement are required based on deficiency criteria, then Opening Year Cumulative Plus Project Plus improvements scenarios will be analyzed.

Intersection Analysis – HCM Methodology

Peak hour intersection operations at the signalized existing intersection and proposed unsignalized driveways were evaluated using the methods prescribed in the *Highway Capacity Manual 6th Edition* (HCM), consistent with the *Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment* (July 2020).

For signalized intersections, the HCM methodology estimates the average delay (in average seconds per vehicle) for each of the movements through the intersection, considering a number of factors, including the number of lanes, volume of traffic, and the signal timing phasing.

For unsignalized intersections, the HCM methodology analysis determines the average total delay for each vehicle making any movement from the stop-controlled minor street, as well as left turns from the major street. Delay values are calculated based on the relationship between traffic on the major street and the availability of acceptable gaps in the traffic stream through which conflicting traffic movements can be made.

The HCM delay forecast translates to a Level of Service (LOS) designation, ranging from LOS A to LOS F. A summary of each LOS and the corresponding delay is provided in **Table 16, Level of Service Definitions** and **Table 17, Level of Service Criteria**.

Table 16: Level of Service Definitions

Level of Service	Description
A	No approach phase is fully utilized by traffic and no vehicle waits longer than one red indication. Typically, the approach appears quite open, turns are made easily and nearly all drivers find freedom of operation.
B	This service level represents stable operation, where an occasional approach phase is fully utilized and a substantial number are approaching full use. Many drivers begin to feel restricted within platoons of vehicles.
C	This level still represents stable operating conditions. Occasionally drivers may have to wait through more than one red signal indication, and backups may develop behind turning vehicles. Most drivers feel somewhat restricted but not objectionably so.
D	This level encompasses a zone of increasing restriction, approaching instability at the intersection. Delays to approaching vehicles may be substantial during short peaks within the peak period; however, enough cycles with lower demand occur to permit periodic clearance of developing queues, thus preventing excessive backups.
E	Capacity occurs at the upper end of this service level. It represents the most vehicles that any particular intersection approach can accommodate. Full utilization of every signal cycle is seldom attained no matter how great the demand.

F	This level describes forced flow operations at low speeds, where volumes exceed capacity. These conditions usually result from queues of vehicles backing up from a restriction downstream. Speeds are reduced substantially, and stoppages may occur for short or long periods of time due to the congestion. In the extreme case, both speed and volume can drop to zero.
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Table 17: Level of Service Criteria

Level of Service	Signalized Intersection (Average delay per vehicle, in seconds) ¹	Unsignalized Intersections (Average delay per vehicle, in seconds) ²
A	≤ 10	0 – 10
B	> 10 – 20	> 10 – 15
C	> 20 – 35	> 15 – 25
D	> 35 – 55	> 25 – 35
E	> 55 – 80	> 35 – 50
F	> 80	> 50

¹ Source: Highway Capacity Manual (HCM 2010), Exhibit 18-4.
² Source: Highway Capacity Manual (HCM 2010), Exhibits 19-1 and 20-2.

Level of Service Standards

The City of Riverside General Plan includes the following policies regarding minimum acceptable LOS:

- a) LOS C is to be maintained at all street intersections
- b) LOS D is to be maintained at intersections of Collector or higher Classification. See General Plan Policy CCM – 2.3

For projects that propose intensities above that contained in the General Plan:

Operational improvements are required when the addition of project related trips causes either peak hour LOS to degrade the acceptable (A through D) to unacceptable levels (E or F) or the peak hour delay to increase as follows:

- LOS A/B – By 10 seconds
- LOS C – By 8 seconds
- LOS D – By 5 seconds
- LOS E – By 2 seconds
- LOS F – By 1 seconds

Existing Traffic Volumes

Starting March of 2020, the COVID-19 Pandemic has altered trip patterns and traffic levels as a result of the California Governor’s Stay at Home Order and school closures. The City of Riverside recommends that any studies conducted during this initial or any subsequent stay at home order may qualify for special accommodations regarding data collection. Historical counts within the Project study area were not available and therefore historical morning and evening peak hour turning movement volumes for the intersection of Overlook Parkway/Canyon Crest Drive and Alessandro Boulevard were obtained from the Meridian South Campus Traffic Impact Analysis collected in August 2019. Peak hour counts for the intersection of Overlook Parkway/Canyon Crest Drive and Alessandro Boulevard and Alessandro Boulevard and Glenhaven Avenue were conducted on October 20, 2020. A COVID-19 factor was applied to the intersection of Alessandro Boulevard and Glenhaven Avenue to properly represent pre-COVID-19 conditions.

Adjusted existing morning and evening peak hour volumes are presented on **Exhibit 12, Existing Traffic Volumes**. Traffic volumes and COVID-19 factor calculations are provided in Appendix B of the Focused Traffic Impact Study provided as Appendix H to this Initial Study.

Existing Intersection and Roadway Operating Conditions

Intersection LOS analysis was conducted for the morning and evening peak hours using the analysis procedures and assumptions described previously in this report. The results of the intersection analysis for Existing Conditions are shown on **Table 18, Summary of Intersection Operation Existing Conditions**. Copies of Existing Conditions intersection analysis worksheets are provided in *Appendix C of the Focused Traffic Study*, provided as *Appendix H* of this Initial Study.

Table 18: Summary of Intersection Operation Existing Conditions

Int. #	Intersection	Traffic	AM Peak Hour		PM Peak Hour	
		Control	Delay	LOS	Delay	LOS
1	Alessandro Blvd & Glenhaven Ave	S	8.4	A	9.6	A
2	Glenhaven Ave & Driveway 1/ Glenhaven Ct	U	FUTURE INTERSECTION			
3	Glenhaven Ave & Driveway 2	U	FUTURE INTERSECTION			

Notes:
 - Bold values indicate intersections operating at an unacceptable LOS
 - Delay values for unsignalized intersections represent the average vehicle delay on the worst (highest delay) intersection approach.

Review of Table 18 indicates that all study intersections are currently operating at an acceptable LOS under Existing Conditions.

Project Traffic

Project Trip Generation

Trip generation estimates for the Orangecrest Church project are based on daily and peak hour trip generation rates obtained from the Institute of Transportation Engineers (ITE) Trip Generation Manual (10th Edition) and additional sources. The following ITE code was used:

- ITE Land Use 560: Church

Daily, AM peak hour, and PM peak hour trips were estimated for a proposed 19,945 SF church. Trip rates and the estimated Project trip generation are shown on **Table 19, Summary of Project Trip Generation**. The Project is expected to generate 138 daily trips, 7 trips during the AM peak (four inbound and three outbound) and 9 trips during the PM peak (four inbound and five outbound).

Table 19: Summary of Project Trip Generation

Land use	ITE Code	Units	Daily Trips	Trip Generation Rates ¹					
				AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Church	560	ksf	6.950	0.198	0.132	0.33	0.221	0.270	0.49

Land use	Quantity	Units	Daily	Trip Generation Estimates ²					
				AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Church	19,945	ksf	138	4	3	7	4	5	9
Total Project Trips			138	4	3	7	4	5	9

¹ Source: Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition
 KSF = Thousand Square Feet

Trip Distribution and Assignment

Project trip distribution assumptions for the Project site were developed taking into account the proposed site use, and routes to and from the freeway system. Trip distribution and assignment for Project trips are shown on **Exhibit 13, Project Distribution (Refer to Attached Exhibits)**. **Exhibit 14, Project-Related Traffic Volumes**, shows the total Project trip assignment.

Future Conditions with Project

Project Opening Year 2021 Plus Cumulative Projects Plus Project Traffic Conditions

Project-related traffic was added to the Project Opening Year 2021 Plus Cumulative Project Traffic volumes. Cumulative project information can be found in Appendix D of the TIA which is provided as Appendix H in this Initial Study. Project Opening Year 2021 Plus Cumulative Project Plus Project Traffic at study intersections are shown on **Exhibit 15, Opening Year 2021 Plus Cumulative Projects Plus Project Traffic Volumes (Refer to Attached Exhibits)**.

Intersection and Roadway Operating Conditions

Intersection LOS analysis was conducted for the morning and evening peak hours for the Project Opening Year 2021 Plus Cumulative Projects Plus Project Traffic condition. The results are shown on **Table 20, Summary of Intersection Operation Opening Year 2021 with Cumulative Projects with Project Conditions**. Intersection analysis worksheets for this scenario are provided in Appendix C of the TIA provided as Appendix H of this Initial Study.

Table 20: Summary of Intersection Operation Opening Year 2021 with Cumulative Projects with Project Conditions

Int. #	Intersection	AM Peak Hour		PM Peak Hour	
		With Project		With Project	
		Delay	LOS	Delay	LOS
1	Alessandro Blvd & Glenhaven Ave	9.2	A	10.1	B
2	Glenhaven Ave & Driveway 1/ Glenhaven Ct	10.2	B	8.9	A
3	Glenhaven Ave & Driveway 2	9.0	A	8.9	A

Source: Focused Traffic Study, Kimley-Horn and Associates, November 2020.
Notes: Bold values indicate intersections operating at an unacceptable Level of Service.
- Delay values for unsignalized intersections represent the average vehicle delay on the worst (highest delay) intersection approach.

Review of Table 20 indicates that all study intersections would operate at an acceptable LOS under Opening Year 2021 Plus Cumulative Projects Plus Project Traffic Conditions.

Church Classroom Operations

The Project anticipates retaining six full-time employees and seven part-time employees. The administration/office operating hours would be Mon-Fri from 8am-5pm. Initially, 2 worship services will be held for Sunday morning service activities which will be held from 9am to 11:30am. Eventually, primary worship services will occur up to 3 times on Sunday mornings from approximately 9am to 1pm. Midweek gatherings and events are anticipated to occur as follows:

- Small gatherings (i.e., 5-20 people) most weeknights (M-F), approximately 7pm to 9pm.
- Occasionally, the property will be utilized for monthly special events of larger gatherings (larger than 20 people) on a Friday or Saturday evening, approximately from 6pm to 9pm.

Additionally, youth and children’s ministries would have a weekly gathering (i.e., Wednesday) from approximately 6:30pm to 8:30pm.

Site Access Analysis

Vehicular access for the Project site would be via two full-access driveways on Glenhaven Avenue. **Table 21, Opening Year 2021 with Cumulative Project with Project Conditions**, shows the driveway queues for the morning and evening peak hours.

Table 21: Opening Year 2021 with Cumulative Project with Project Conditions

Intersection	Movement	Peak Hour	95th Percentile Queue (ft)	Exceeds Available Storage
Alessandro Boulevard & Glenhaven Avenue	Southbound (left)	AM	119'	NO
		PM	122'	NO
Glenhaven Avenue & Driveway 1	Eastbound (right/thru/left)	AM	0	NO
		PM	0	NO
Glenhaven Avenue & Driveway 2	Eastbound (right/thru/left)	AM	0	NO
		PM	0	NO

Source: Focused Traffic Study, Kimley-Horn and Associates, November 2020.
Notes:
95th Percentile Queues are based on Synchro HCM 6th Edition reports (version 10.0).

As shown on Table 21, the queues do not disrupt the internal circulation on the site. There are no sight distance issues as there are no steep grades or obstructive landscaping along the southbound side of Glenhaven Avenue. Lastly, as shown in the Scoping Agreement in Appendix A of the TIA provided as Appendix H of the Initial Study, the Project is screened from Vehicle Miles Traveled (VMT) assessment as it is a local serving church.

a. Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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17a. Response: (Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, FPEIR Figure 5.15-4 – Volume to Capacity (V/C) Ratio and Level of Service (LOS) (Typical 2025), Table 5.15-D – Existing and Future Trip Generation Estimates, Table 5.15-H – Existing and Typical Density Scenario Intersection Levels of Service, Table 5.15-I – Conceptual General Plan Intersection Improvement Recommendations, Table 5.15-J – Current Status of Roadways Projected to Operate at LOS E or F in 2025, Table 5.15-K – Freeway Analysis Proposed General Plan, Appendix H – Circulation Element Traffic Study and Traffic Study Appendix, SCAG’s RTP, and Project Specific Focused Traffic Impact Study prepared by Kimley-Horn and Associates prepared on November 2020, provided as Appendix H)

Less than Significant Impact. Roadway capacity is adequate to accommodate the projected traffic volumes of the proposed Project. As determined by the City Traffic Engineer and the Focused Traffic Impact Analysis prepared for the proposed Project by Kimley-Horn and provided as Appendix H to this Initial Study. As noted in Table 20, Intersection #1 (Alessandro Blvd & Glenhaven Ave) will operate at LOS A in the AM Peak Hour and LOS B in the PM Peak Hour; Intersection #2 (Glenhaven Ave & Driveway 1/Glenhaven Ct) will operate at LOS B in the AM Peak Hour and LOS A in the PM Peak Hour; and Intersection #3 (Glenhaven Ave & Driveway 2) will operate at LOS A in both the AM and PM Peak Hours, which is better than the required LOS D.

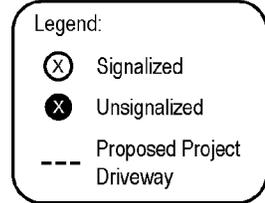
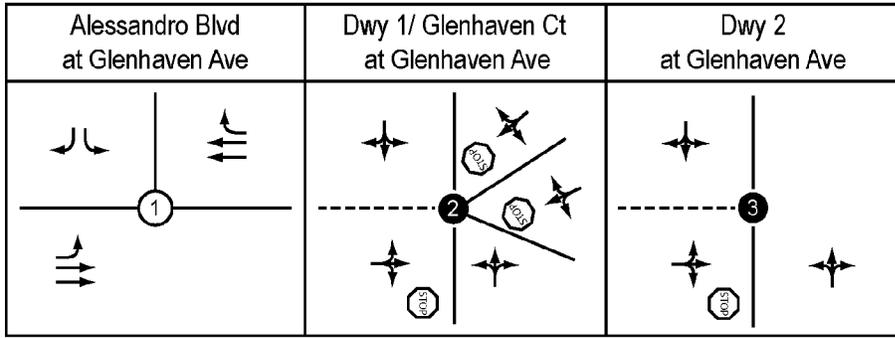
Additionally, the Project is local serving and would not alter any existing bicycle, public transit, or pedestrian facilities, and would not substantially induce the increase use of such infrastructure. Therefore, the increase in traffic in relation to the existing traffic load and capacity of the street system is **less than significant** directly, indirectly or cumulatively.

b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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17b.(Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, General Plan 2025 Figure CCM-5 – Transit Facilities)

Less than Significant Impact. As noted in the Scoping Agreement, provided on Appendix A of the TIA which is available as Appendix H of the Initial Study, the Project is screened from VMT assessment, as it is a local serving church. The

Project would not conflict and would not be inconsistent with CEQA Guidelines §15064.3, subdivision (b). As such, a less than significant impact would occur.				
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>17c.Response: (Source: General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas, Riverside County Airport Land Use Compatibility Plan, 2004. http://www.rcaluc.org/Plans/New-Compatibility-Plan. Accessed November 2020)</p> <p>Less than Significant Impact. Refer to Threshold Response 13(c). The project site is not within the Airport Influence Area Boundary as shown in the General Plan Airport Safety Zones Figure and Map R1 and Compatibility Map Riverside Municipal Airport of the Airport Land Use Compatibility Plan. Therefore, the proposed project, which will develop a local serving church, will not create a change in air traffic patterns, and impacts related to safety risks related to a change in air traffic patterns are not anticipated to occur from implementation of the proposed project. As such, a less than significant impact on air traffic patterns would occur from the increase in traffic levels.</p>				
d. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>17d.Response: (Source: Project Site Plans)</p> <p>Less than Significant Impact. The proposed Project is compatible with adjacent existing residential uses. It has been designed so as not to cause any incompatible use or any hazards to the surrounding area or general public. Additionally, there are no sight distance issues as there are no steep grades or obstructive landscaping along the southbound side of Glenhaven Avenue. Moreover, the Project will restripe Glenhaven Avenue, half-width from the Project’s northern limit to Alessandro Boulevard. Restriping will include the centerline and repainting the left and right turn arrows and making the left-turn pocket 10-foot-wide and the right-turn pocket 12-foot-wide; refer to Exhibit 16, Preliminary Striping Plan. As proposed, this Project will have a less than significant impact on increasing hazards through design or incompatible uses either directly, indirectly or cumulatively.</p>				
e. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>17e.Response: (Source: California Department of Transportation Highway Design Manual, Municipal Code, and Fire Code and Focused Traffic Study, prepared by Kimley-Horn and Associated, prepared November 2020)</p> <p>Less than Significant Impact. Emergency ingress and egress is available via the two 26-foot-wide driveways located along Glenhaven Avenue. Because the Project provides ample ingress and egress opportunities, these driveways ensure that emergency vehicles have an unobstructed ingress and egress to the Project site.</p> <p>As a standard City practice, if road closures (complete or partial) are necessary, the RPD and RFD would be notified of the construction schedule and any required detours would allow emergency vehicles to use alternate routes for emergency response. Additionally, the Project will be developed in compliance with Title 18, Section 18.210.030 and the City’s Fire Code Section 503 (California Fire Code 2007).</p> <p>The RFD would review the proposed Project and would provide comments regarding fire and emergency access. The proposed Project would comply with the RFD requirements. The impact on emergency access from Project implementation would be less than significant.</p>				



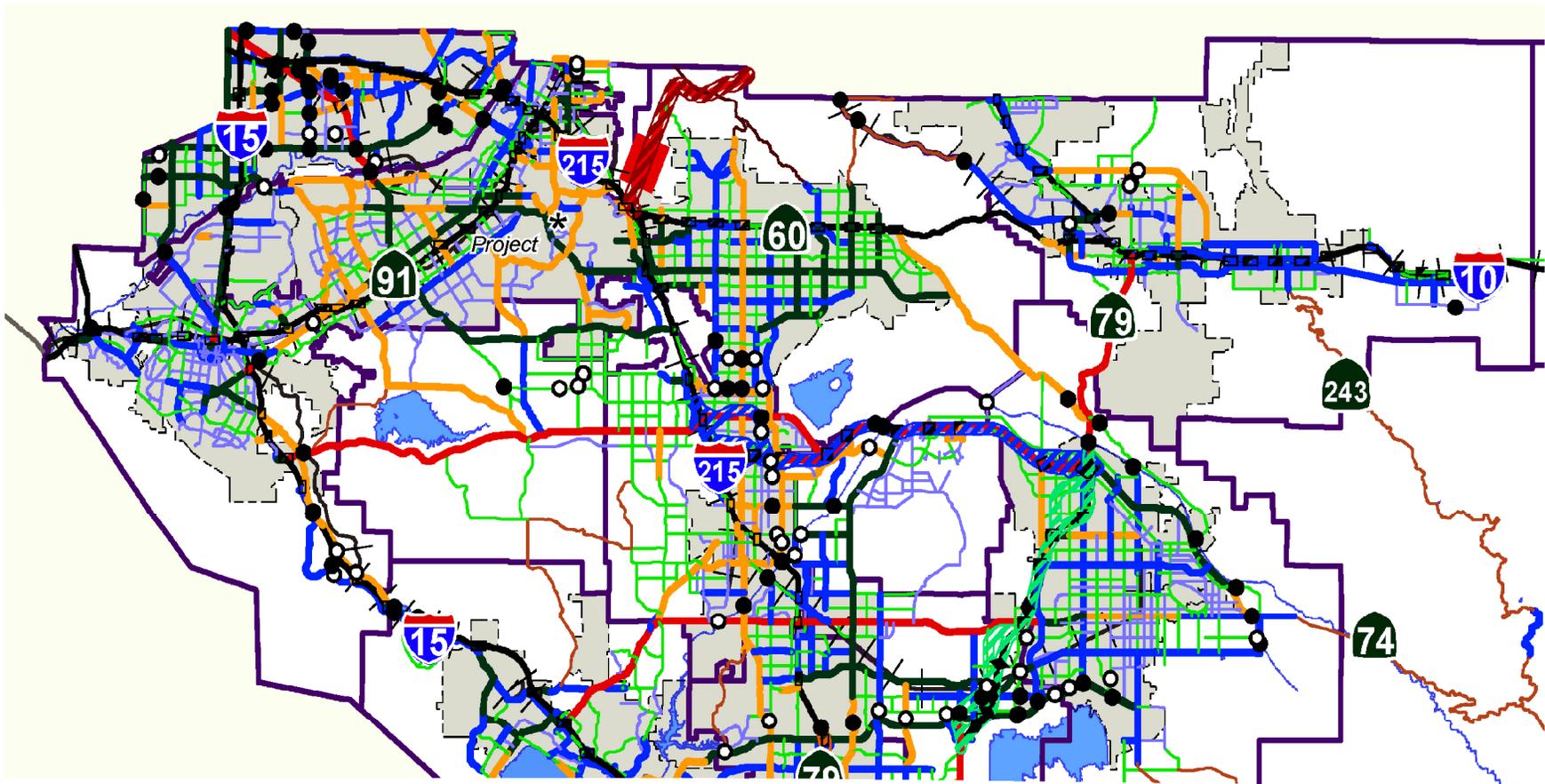
Source: Kimley Horn - TIA for Orangecrest Community Church

EXHIBIT 10: Existing Lane Configuration and Traffic Control

Orangecrest Community Church



not to scale



Circulation Designations

- Freeway (Variable ROW)
- Expressway (128' to 220' ROW)
- Urban Arterial (152' ROW)
- Arterial (128' ROW)

- Major (118' ROW)
- Secondary (100' ROW)
- Mountain Arterial 4 Ln (110' ROW)
- Mountain Arterial 2 Ln (110' ROW)
- Collector (74' ROW)

Interchanges

- Existing Interchange
- Proposed Interchange
- Existing Overpass/Underpass
- Proposed Overpass/Underpass

CETAP Corridors

- Moreno Valley to San Bernardino CETAP
- East-West CETAP Corridor
- Winchester to Temecula CETAP
- SR-79 Re-alignment Study Area

Bridges

- Existing Bridge
- Proposed Bridge

Data Source: Riverside County Transportation

- Railroads Amended
- Proposed Tunnel Section
- Area Plan Boundary
- City Boundary
- Waterbodies

Source: Kimley Horn - TIA for Orangecrest Community Church

EXHIBIT 11: City of Riverside Circulation Plan
Orangecrest Community Church

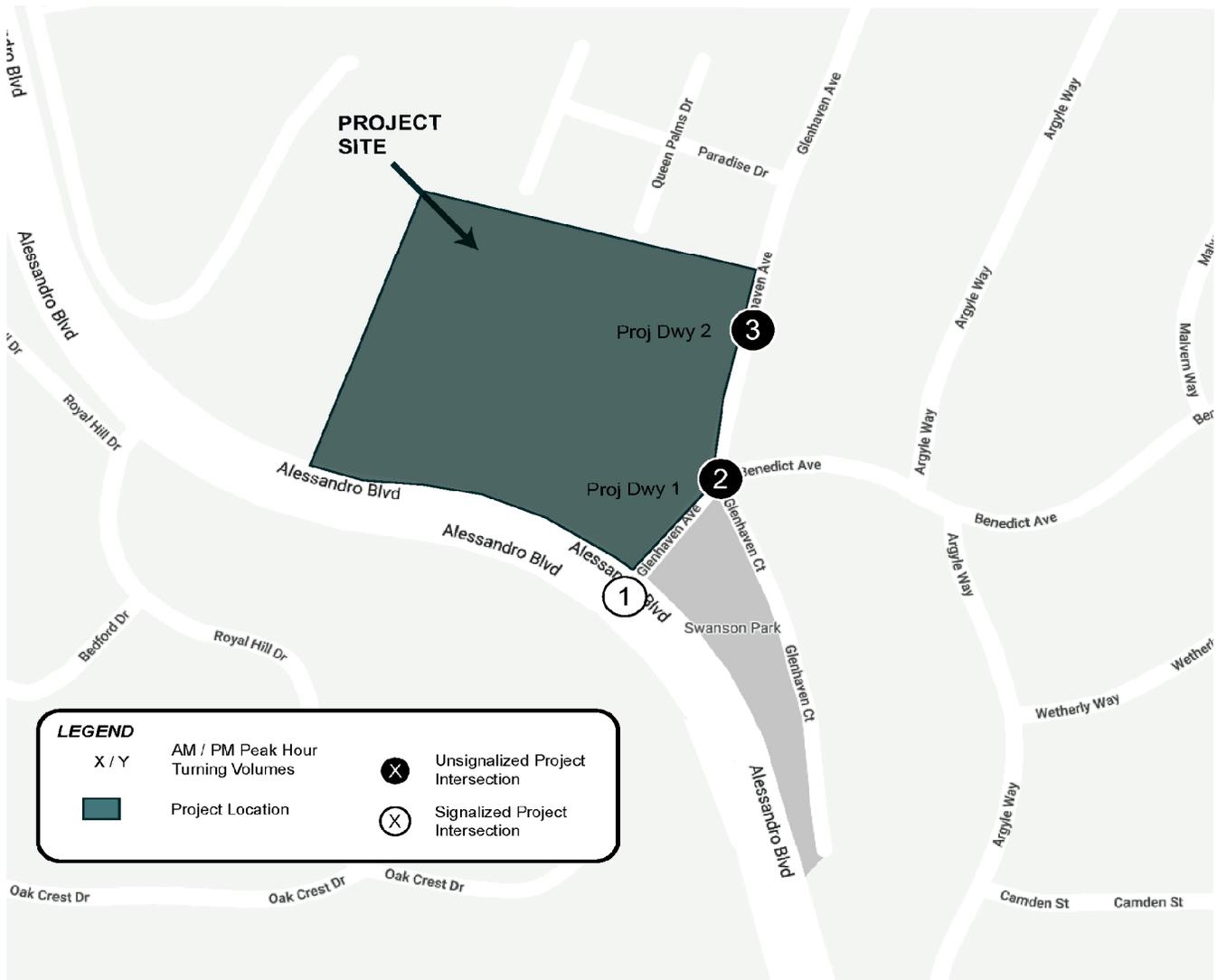


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not to scale



<p>1</p> <p>59 / 30 ↗ 68 / 83 ↘ Glenhaven Ave</p> <p>↖ 59 / 117 ↘ 1771 / 1129</p> <p>Alessandro Blvd</p>	<p>2</p> <p>126 / 113 ↖ Glenhaven Ave</p> <p>Dwy 1</p>	<p>1 / 0 ↖</p>	<p>3</p> <p>126 / 113 ↖ Glenhaven Ave</p> <p>Dwy 2</p>	
<p>23 / 33 ↗ 672 / 2488 ↘</p>		<p>77 / 142 ↖ 5 / 8 ↘</p>		<p>77 / 142 ↖</p>



Source: Kimley Horn - TIA for Orangecrest Community Church

EXHIBIT 12: Existing Traffic Volumes

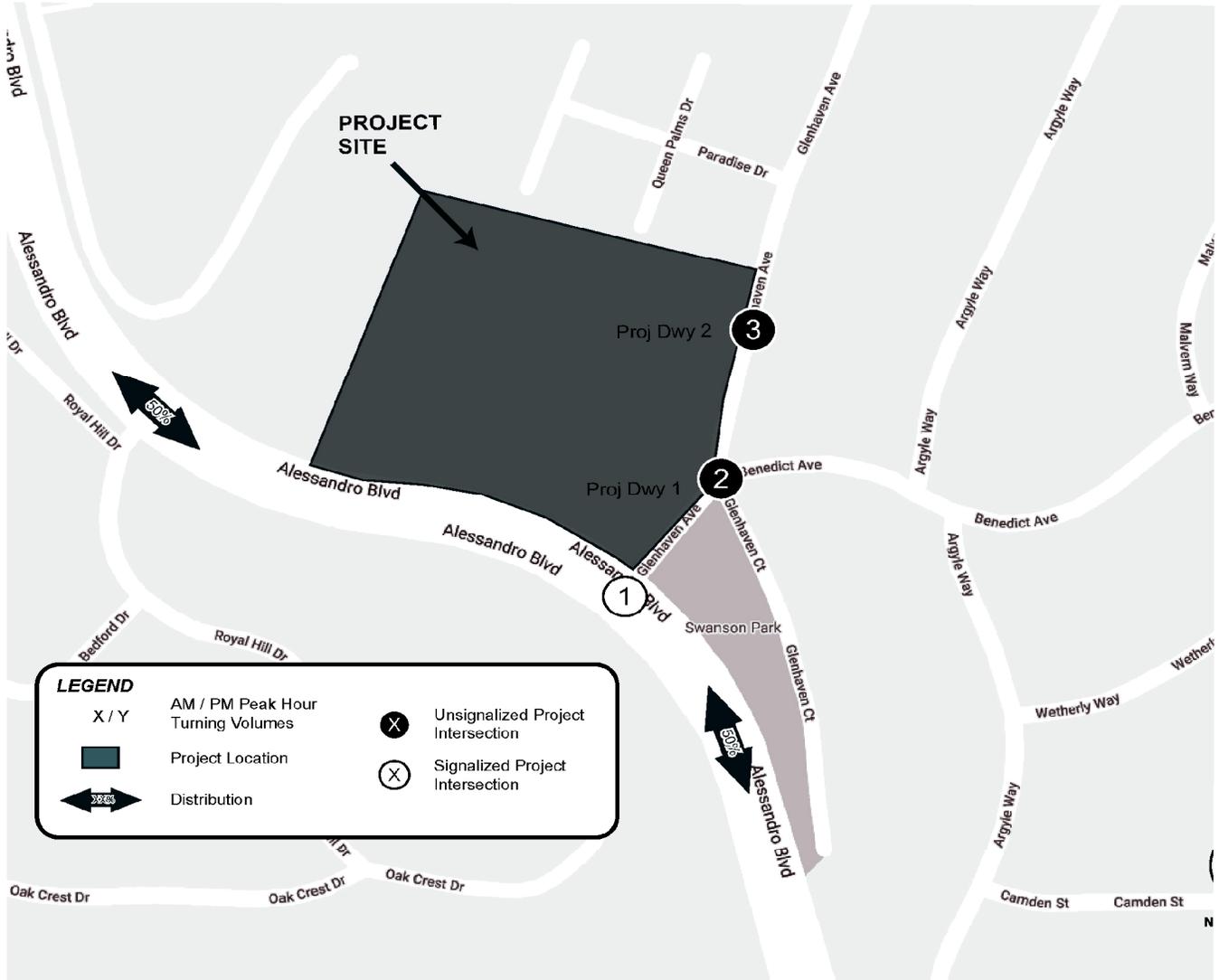
Orangecrest Community Church

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not to scale

<p>1</p> <p>(50%) (50%) Glenhaven Ave</p> <p>50%</p> <p>Alessandro Blvd</p>	<p>2</p> <p>(50%) Glenhaven Ave</p> <p>Dwy 1</p> <p>Glenhaven Ct</p>	<p>3</p> <p>Glenhaven Ave</p> <p>Dwy 2</p>
<p>50%</p>	<p>(50%)</p> <p>50% 50%</p>	<p>(50%)</p> <p>50%</p>



Source: Kimley Horn - TIA for Orangecrest Community Church

EXHIBIT 13: Project Distribution

Orangecrest Community Church

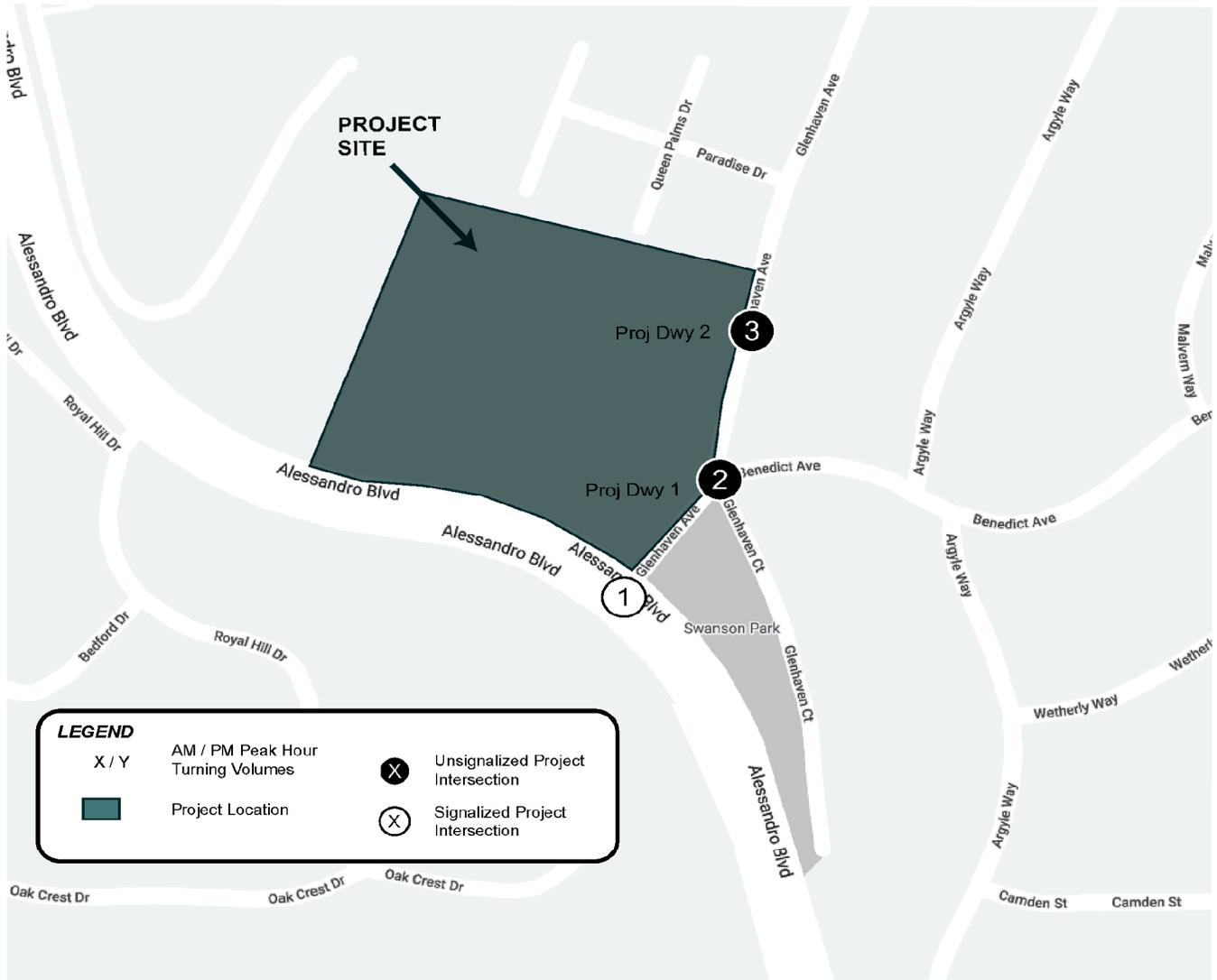
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not to scale



<p>1</p> <p>2 / 3</p> <p>2 / 3</p> <p>Glenhaven Ave</p> <p>2 / 2</p> <p>Alessandro Blvd</p>	<p>2</p> <p>2 / 3</p> <p>Glenhaven Ave</p> <p>Dwy 1</p> <p>Glenhaven Ct</p>	<p>3</p> <p>Glenhaven Ave</p> <p>Dwy 2</p>
<p>2 / 2</p>	<p>2 / 3</p> <p>2 / 2</p> <p>2 / 2</p>	<p>2 / 3</p> <p>2 / 2</p>



Source: Kimley Horn - TIA for Orangecrest Community Church

EXHIBIT 14: Project-Related Traffic Volumes
 Orangecrest Community Church

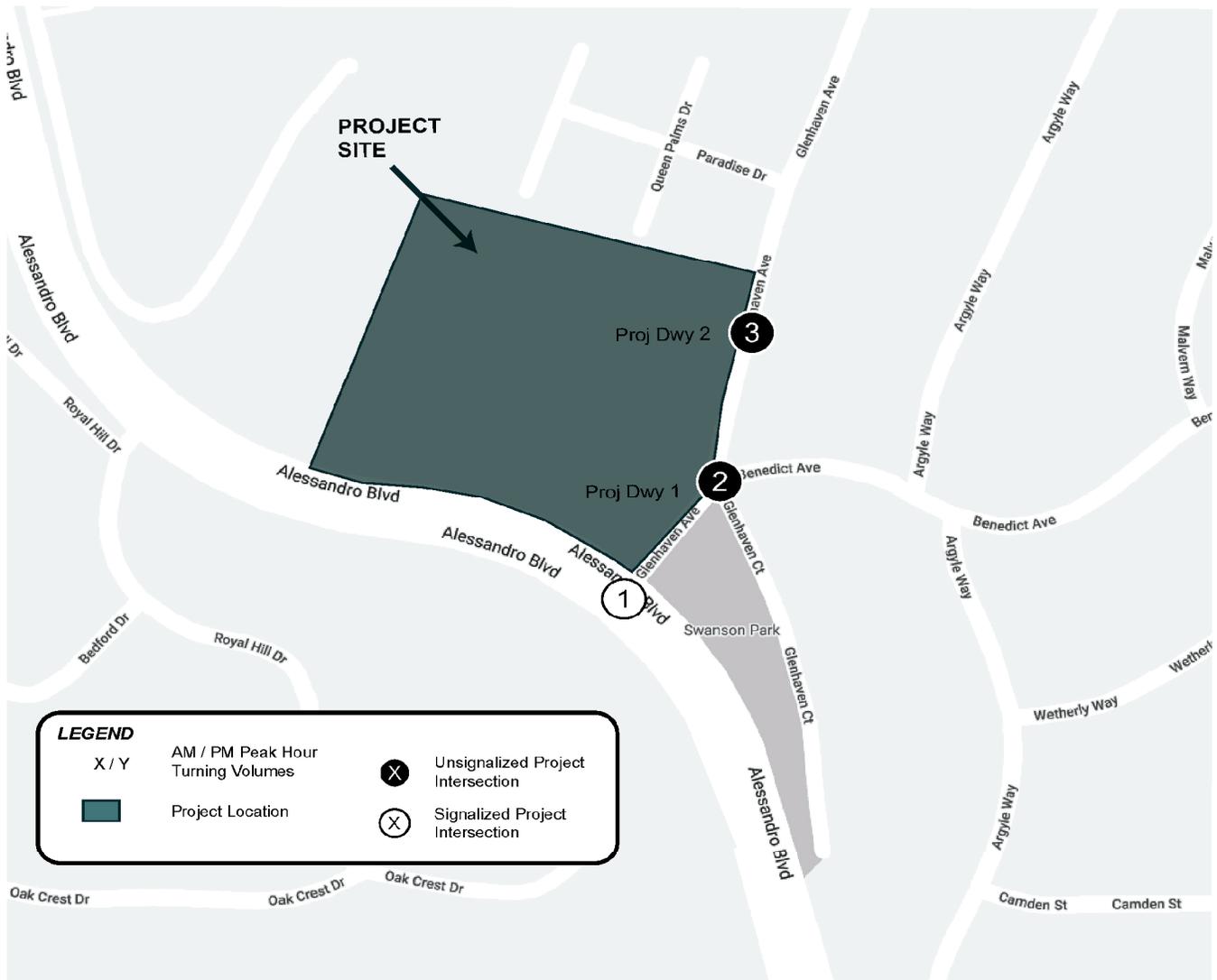
\\rivp01\CA_RIV\1RIV_GIS\195272001- Orangecrest Church\13 Project-Related Traffic Volumes.mxd



not to scale



1 ↖ 71 / 33 ↘ 80 / 86 Alessandro Blvd ↗ 61 / 129 ↙ 1774 / 1135	2 ↖ 128 / 116 Glenhaven Ave ↗ 21 / 0 Dwy 1 Glenhaven Ct	3 ↖ 126 / 113 Glenhaven Ave ↗ 2 / 2 ↘ 77 / 142 ↙ 79 / 144 ↘ 5 / 28 Dwy 2
↖ 25 / 45 ↘ 677 / 2492	↖ 2 / 3 ↘ 2 / 2 ↘ 79 / 144 ↘ 5 / 28	↖ 2 / 3 ↘ 2 / 2 ↘ 77 / 142



Source: Kimley Horn - TIA for Orangecrest Community Church

EXHIBIT 15: Opening Year 2021 Plus Cumulative Projects Plus Project Traffic Volumes
 Orangecrest Community Church



not to scale

18. TRIBAL CULTURAL RESOURCES.

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.				

18a and 18b. Response: (Source: AB52 Consultation)

Less than Significant Impact. As of July 2015, California Assembly Bill 52 (AB 52) was enacted and expands CEQA by defining a new resource category, “Tribal Cultural Resources.” AB 52 requires Lead Agencies to evaluate a project’s potential to impact tribal cultural resources. Such resources include “[s]ites, features, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe and is 1) listed or eligible for listing in the CRHR or included in a local register of historical resources. AB 52 also gives Lead Agencies the discretion to determine, supported by substantial evidence, whether a resource qualifies as a “tribal cultural resource.” As discussed in Threshold 5(a) above, as part of the Cultural Resources Assessment prepared by BCR Consulting in October 22, 2020, archaeologists did not record any cultural resources within the subject property boundaries.

According to AB 52, Native American consultation is required upon request by a California Native American tribe that has previously requested that the City provide it with notice of such Project. On July 23, 2020, the City of Riverside provided the required notices to the tribes through certified mail. The following Native American Tribes were notified:

- Morongo Band of Mission Indians;
- San Gabriel Band of Mission Indians;
- Gabrieleno Band of Mission Indians – Kizh Nation;
- Pechanga Band of Luiseño Mission Indians;
- Soboba Band of Luiseño Indians;
- Rincon Band of Luiseño Indians;
- Morongo Band of Mission Indians;
- Cahuilla Band of Indians;
- San Manuel Band of Mission Indians; and the
- Agua Caliente Band of Cahuilla Indians.

As a result of AB 52 notices to interested tribes, the following tribes requested consultation with the City:

- Agua Caliente Band of Cahuilla Indians;
 - Rincon Band of Luiseño Indians; and
 - Soboba Band of Luiseño Indians.
- Agua Caliente Band of Cahuilla Indians officially concluded on May 18, 2020, while Rincon Band of Luiseño Indians and Soboba Band of Luiseño Indians officially concluded consultation on June 15, 2021. The interested tribes agreed that the City’s Standard COAs CUL-1 through CUL-4 were appropriate to mitigate any potential impacts to tribal cultural resources. With the acceptance of the standards COAs CUL-1 through CUL-4 by the interested tribes, AB 52 tribal consultation has officially concluded.

Conditions of Approval

Implementation of COAs CUL-1 through CUL-4.

19. UTILITIES AND SYSTEM SERVICES.				
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>19a. Response: (Source: General Plan 2025 FPEIR – 5.16 Utilities and Service Systems, General Plan 2025 Table PF-1 – RPU PROJECTED DOMESTIC WATER SUPPLY (AC-FT/YR), Table PF-2 – RPU Projected Water Demand, FPEIR Table 5.16-G – General Plan Projected Water Demand for RPU Including Water Reliability for 2025, Table 5.16-K - Estimated Future Wastewater Generation for the City of Riverside’s Sewer Service Area)</p> <p>Less than Significant Impact. The City’s Urban Water Management Plan must be updated every five years to include the most recent population trends. The Project site is currently developed with a former swim and tennis club and the site is provided with stormwater drainage, electric power, natural gas, and telecommunication infrastructure. The Project site would continue to be served domestic water by the Riverside Public Utilities (RPU) and sewer services by the City of Riverside Public Works Department. The Project would maintain the two existing buildings and would add three new buildings (Buildings C, D, and E), as noted in Table 1. As shown on Figure 5.16-2, Drainage Facilities and Figure 5.16-4, Water Facilities of the General Plan, water line infrastructure is provided along Alessandro Boulevard and Glenhaven Avenue and drainage infrastructure is provided along Alessandro Boulevard.</p> <p>Pursuant to AB 610, the Project does not require a Water Supply Assessment. As noted in Table 5.16-E of the Utilities section of the General Plan 2025 Final PEIR, RPU’s 2025 water supply would include up to 32,138 acre-feet of supply from planned sources. These sources include additional groundwater pumping and treatment, additional exchange with the Gage Canal Company, additional potable water made available through increased recycled water use, additional supply made available through the Seven Oaks Dam Conservation storage project and increased imported water from Western Municipal Water District (WMWD).</p> <p>As noted above, the proposed Project would continue to be connected to existing potable water supply infrastructure along Alessandro Boulevard and Glenhaven Avenue. The City of Public Works Department provides for the collection, treatment and disposal of nearly all wastewater generated within the City of Riverside, through its Riverside Regional Water Quality Treatment Plan and complies with State and Federal requirements governing the treatment and discharge of wastewater. The proposed Project would continue to be connected to the existing sewer pipeline in Alessandro Boulevard. The proposed Project will continue to receive other utilities, including gas, electric, and telecommunication on Glenhaven Avenue. No relocation or construction of expanded utilities are needed for the Project. Therefore, this Project was found to have a less than significant impact on these utilities either directly, indirectly or cumulatively.</p>				
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>19b. Response: (Source: FPEIR Figure 5.16-3 – Water Service Areas, Figure 5.16-4 – Water Facilities, Table 5.16-E – RPU Projected Domestic Water Supply (AC-FT/YR, Table 5.16-F – Projected Water Demand, Table 5.16-G – General Plan Projected Water Demand for RPU including Water Reliability for 2025, RPU Master Plan.))</p> <p>Less than Significant Impact. Refer to Response 19(a) above. RPU updated its Urban Water Management Plan in 2005 consisting of water supply and demand to the year 2030. The RPU anticipates that supply will exceed demand by over 16,000 acre-feet per year by year 2030. Additionally, at worst case scenario, RPU may purchase water from WMWD to meet additional water demand not accounted in the Urban Water Management Plan (UWMP).</p> <p>According to the RPU UWMP, which is incorporated herein by reference, projected domestic water demand is expected to increase from 77,767 acre-feet per year in 2005 to 99,835 acre-feet per year in 2025 in normal water years. The</p>				

projected water demand (99,835 acre-feet) under the Typical build-out scenario⁴ is below the water supply anticipated to be available to the RPU in that year (112,671 acre-feet). RPU's projected water supplies and demand are presented in **Table 22, RPU Projected Domestic Water Supply (ac-ft/yr)** and **Table 23, RPU Projected Water Demand**. During single dry year conditions, supply is expected to exceed demand by 9,528 acre-feet, and under multiple dry year conditions supply is expected to exceed demand by 14,786 acre-feet. RPU is able to provide excess supply even in multiple dry years because it relies mainly on groundwater, which has proven to be very reliable even in multiple dry years.

Table 22: RPU Projected Domestic Water Supply (ac-ft/yr)

Water Supply Sources	2010	2015	2020	2025	2030
Existing (as of 2005)					
Total Groundwater	72,033	72,033	72,033	72,033	72,033
Imported Water*	3,800	5,300	6,800	8,300	9,800
Recycled Water**	200	200	200	200	200
Planned					
John W. North Water Treatment Plant (Groundwater)	10,000	10,000	10,000	10,000	10,000
Riverside Groundwater- Downtown Area	-	-	7,000	7,000	7,000
Additional Gage Exchange (groundwater)	5,388	5,388	5,388	5,388	5,388
Recycled water	1,000	3,250	5,500	7,750	10,000
Seven Oaks Dam Conservation Storage	2,000	2,000	2,000	2,000	2,000
Total					
Groundwater	87,421	87,421	94,421	94,421	94,421
Purchased (Imported) water	3,800	5,300	6,800	8,300	9,800
Recycled water	1,200	3,450	5,700	7,950	10,200
Seven Oaks Dam***	2,000	2,000	2,000	2,000	2,000
Total	94,421	98,171	108,921	112,671	116,421

Table 23: RPU Projected Water Demand

Water Use Sector	2005	2010	2015	2020	2025	2030
Residential	44,297	48,019	50,071	51,545	52,538	53,856
Commercial	12,167	13,188	13,752	14,157	14,430	14,792
Industrial	11,211	12,152	12,672	13,046	13,297	13,630
Agriculture	1,244	1,348	1,406	1,447	1,475	1,512
Other	421	456	476	490	499	512
Sale to Home Gardens County Water District	540	540	540	540	540	540
Unaccounted for Water*	7,687	8,327	8,681	8,935	9,106	9,333
Subtotal Domestic Demand	77,567	84,031	87,598	90,158	91,885	94,174
Recycled Water	200	1,200	3,450	5,700	7,950	10,200
Total	77,767	85,231	91,048	95,858	99,835	104,374

As noted in Table 22 and 23 above, RPU's 2025 water supply would include up to 32,138 acre-feet of supply from planned sources. These sources include additional groundwater pumping and treatment, additional exchange with the Gage Canal Company, additional potable water made available through increased recycled water use, additional supply made available through the Seven Oaks Dam Conservation storage project and increased imported water from WMWD.

RPU anticipates that supply will exceed demand by over 12,000 acre-feet per year in 2025. RPU's 2030 water demand was based on a service area (covering 68.5 square miles within the City limits and 5.6 square miles outside the City limits) with a service area population of 316,000. Development assumed in the UWMP for RPU included the addition

⁴ The Typical build-out scenario is consistent with SCAG population projections for the Planning Area. In addition, RPU commissioned an independent population projection as part of its Urban Water Management Plan process, which is also broadly consistent with the projections on which the Typical scenario is based.

of up to 38,100 new dwelling units and 39.6 million square feet of new non-residential construction over the 20- year horizon of the General Plan within the Planning Area, which encompasses not only Riverside City limits but also the northern and southern Spheres of Influence. Additionally, as noted in **Table 24, General Plan Projected Water Demand for RPU Including Water Reliability for 2025**, the RPU anticipates adequate water supplies for year 2025 under multiple-dry year conditions based on current land use projections.

Table 24: General Plan Projected Water Demand for RPU Including Water Reliability for 2025

Land Use	Water Use(AFY) /Meter	Projected Residential Meters* / Non- Residential usage (acre)			Projected Water Demand 2025			Projected Water Supply 2025		
		Typ	Max	Max/ PRD	Typ	Max	Max/ PRD	Normal	Single Dry Year	Multi Dry Year
Residential	.8* *	73,645	94,333	112,193	58,916 AFY	75,466 AFY	89,754 AFY	112,671 AFY	104,371 AFY	104,371 AFY
Commercial	5.0 AFY	446.15	743.6		2,230.75 AFY	3,718 AFY				
Other	.6.4 AFY	251.95	377.93		1,612.48 AFY	2,418.75 AFY				
TOTAL					62,759.2 3 AFY	81,602.75 AFY	89,754 AFY			

The Project will not exceed expected water supplies. Therefore, the Project will have a **less than significant impact** resulting in the insufficient water supplies either directly, indirectly or cumulatively.

c. Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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19c.Response: (Source: FPEIR Figure 5.16-5 - Sewer Service Areas, Figure 5.16-6 -Sewer Infrastructure, Table 5.16-K - Estimated Future Wastewater Generation for the City of Riverside's Sewer Service Area, Wastewater Integrated Master Plan and Certified EIR)

No Impact. The Project will not exceed wastewater treatment requirements of the Regional Water Quality Control Board. The Project would be consistent with the General Plan 2025 Typical Growth Scenario where future wastewater generation was determined to be adequate. Further, the current Wastewater Treatment Master Plan anticipates and provides for this type of Project which is consistent and permitted in the Project site. Therefore, **no impact** to wastewater treatment directly, indirectly or cumulatively will occur.

d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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19d.Response: (Source: FPEIR Table 5.16-A - Existing Landfills and Table 5.16-M - Estimated Future Solid Waste Generation from the Planning Area)

No Impact. The Project is consistent with the General Plan 2025 Typical Build-out Project level where future landfill capacity was determined to be adequate (see Tables 5.16-A and 5.16-M of the General Plan 2025 Final PEIR). The General Plan notes that the remaining total landfill capacity is of approximately 56.57 million tons over the next 16 years (until Year 2025) assumes that no expansion of existing landfills (or development of new landfills) will occur. Therefore, **no impact** to landfill capacity will occur directly, indirectly or cumulatively.

e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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19e.Response: (Source: California Integrated Waste Management Board 2002 Landfill Facility Compliance Study)

No Impact. The California Integrated Waste Management Act under the Public Resource Code requires that local jurisdictions divert at least 50 percent of all solid waste generated by January 1, 2000. The City is currently achieving

a 60 percent diversion rate, well above State requirements. In addition, the California Green Building Code requires all developments to divert 50 percent of non-hazardous construction and demolition debris for all projects and 100 percent of excavated soil and land clearing debris for all non-residential projects beginning January 1, 2011. The proposed Project must comply with the City's waste disposal requirements as well as the California Green Building Code and as such would not conflict with any Federal, State, or local regulations related to solid waste. Therefore, **no impacts** related to solid waste statutes will occur directly, indirectly or cumulatively.

20. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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20a. Response: (Source: General Plan 2025 PEIR – Volume 2; 5.7 Hazards and Hazardous Materials, General Plan 2025; Circulation and Community Design Element)

Less than Significant Impact. In 2008, CALFIRE produced Fire Hazard Severity Zone maps for the areas of California where local governments have financial responsibility for wildland fire protection, known as local responsibility areas (LRA). In 2008, the California Building Standards Commission adopted California Building Code Chapter 7A requiring new buildings in Very High Fire Hazard Severity Zones to use ignition-resistant construction methods and materials. The Project would not interfere with the City's Emergency Operations Plan because it does not contain any features that would prohibit the execution of such plans. The Project would provide access via Glenhaven Avenue and would contain adequate access and circulation for emergency equipment on-site. Evaluation and approval of the proposed site plan by the Riverside Fire Department would be required to ensure adequacy of emergency access. Thus, impacts to an emergency response plan would be **less than significant**.

b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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20b. Response: (Source: General Plan 2025 PEIR – Volume 2; 5.7 Hazards and Hazardous Materials and Safety Element General Plan 2025; Land Use and Urban Design Element. City of Riverside Municipal Code.)

Less than Significant Impact. Like most Southern California cities, Riverside faces a diverse array of potential natural hazards. The City's undeveloped hillsides are visually appealing but can provide fuel for a wildfire or mudslides in heavy rains. As noted on Figure 5.7-3A – Fire Responsibility Areas of the General Plan EIR, the City has three divisions for fire responsibility within the Planning Area. The areas surrounding the March Air Reserve Base are under federal responsibility. The area known as Box Springs Mountain Regional Reserve in the northeast corner of the City's Planning Area as well as land in the southern quadrant near Lake Mathews falls under the responsibility of the State of California. The State Responsibility Areas (SRA's) are located within the City's sphere of influence portion of the Planning Area and are currently under the County's jurisdiction. The remaining areas are under local responsibility by either the City of Riverside's Fire Department or the County Fire Department in unincorporated portions of the Planning Area. As shown in Figure 5.7-3A and 5.7-3 – Fire Hazard Areas of the General Plan EIR, the Project site is not located in a moderate or very high fire zone. Because the Project site is not located in an area identified as a fire hazard zone, it is anticipated that the proposed Project would not exacerbate wildfire risks, and thereby would not expose Project occupants to pollutant concentrations from a wildfire. **No impact** would occur.

c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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20c. Response: (Source: General Plan 2025; Land Use and Urban Design Element. City of Riverside Municipal Code, City of Riverside Municipal Code, Project Preliminary Site Plan)

No Impact. All proposed Project components would be within the Project site property lines, and impacts associated with the development of the Project within this footprint area are analyzed throughout this document. The Project does

<p>not propose the construction of roads, fuel breaks, emergency water sources, power lines, or other utilities. The Project does not represent a significant impact relative to fire risk, as discussed in Response 20(a) above. Additionally, City's Fire Department, as part of the City's process, will review all building permit plans for adequate fire suppression, fire access, and emergency evacuation. Adherence to standard City policies reduce the potential to exacerbate fire risk. Therefore, no impact would occur.</p>				
<p>d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>20d. Response: (Source: Google Aerial Imagery, FEMA 100 Year Flood Zones GIS Mapping, General Plan 2025 PEIR – Volume 5.8-2 Hydrology Water Quality.)</p> <p>No Impact. As discussed in Response 7(iv), Geology and Soils, the Project site is not located in a landslide hazard area or a floodplain and no signs of flooding or erosion were visible during the geotechnical study site visit. The Project site is relatively flat and is not located in a landslide-prone zone. Additionally, according to Figure 5.8-2 – Flood Hazard Areas of the General Plan, the Project site is not located within a 100 or 500-Year Flood Zone which indicates that the site has a low potential of flooding. Additionally, the Project will provide three infiltration basin to help capture and infiltrate water at the same rate as existing conditions. Therefore, no impact to people or structures from risk of downslope or downstream flooding, landslides, post-fire instability, or drainage would occur.</p>				
<p>21. MANDATORY FINDINGS OF SIGNIFICANCE</p>				
<p>a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>21a. Response: (Source: City of Riverside GIS/CADME USGS Quad Map Layer, MSHCP, General Plan 2025 –Figure OS-7 – MSHCP Cores and Linkage, MSHCP, Title 16 Section 16.72.040 – Establishing the Western Riverside County MSHCP Mitigation Fee, Title 16 Section 16.40.040 – Establishing a Threatened and Endangered Species Fees, City of Riverside Urban Forest Tree Policy Manual, MSHCP, General Plan 2025 – Figure OS-6 – Stephen's Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), Stephens' Kangaroo Rat Habitat Conservation Plan, Biological Resources Assessment, Jurisdictional Delineation, Burrowing Owl Habitat Assessment, Riverine/Riparian and Vernal Pool Assessment, prepared by Jericho Systems on October 1, 2020) (Title 20 of the Riverside Municipal Code, GP 2025 FPEIR Figure 5.5-1 - Archaeological Sensitivity and Figure 5.5-2 - Prehistoric Cultural Resources Sensitivity, AB 52 Consultation and site specific Cultural Resources Assessment prepared by BCR Consulting LLC. In October 2020, provided as Appendix B – Cultural Resources Assessment)</p>				
<p>Less than Significant with Mitigation Incorporated. The proposed project would remodel and expand existing buildings to be used for church operations. As described above, the proposed project would result in several potentially significant project-level impacts including biological resources and cultural resources. The project site does not contain any known historical resources and does not support habitat for any special-status animals or plant communities. Furthermore, the site does not contain riparian habitat. However, development of the proposed project would require ground disturbance, which would have the potential to uncover cultural resources; thus, with implementation of Mitigation Measures BIO-1 and BIO-2 the project would have a less than significant impact on biological resources. In addition, construction of the proposed project could result in the disturbance of nesting birds from ground disturbing activities. Implementations of Conditions of Approval CUL-1 through CUL-4, would reduce impacts to historical and archaeological resources to less than significant.</p>				

b. Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>21b. Response: (Source: FPEIR Section 6 – Long-Term Effects/ Cumulative Impacts for the General Plan 2025 Program)</p> <p>Less than significant with mitigation incorporated. The project would contribute minimally to cumulative development impacts within the region, similar to other future developments. The project would create several potentially significant impacts relating to biological and cultural resources, hazards, and noise. However, the Project would adequately mitigate all potential impacts to less than significant levels with implementation of Mitigation Measures, thereby reducing the project’s cumulative impacts. Therefore, cumulative impacts would be less than significant.</p>				
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>21c. Response: (Source: FPEIR Section 5 – Environmental Impact Analysis for the General Plan 2025 Program)</p> <p>Less than significant with mitigation incorporated. The proposed project is not anticipated to result in significant project-level impacts on human beings. Mitigation measures have been identified that would reduce impacts to biological resources to a less than significant impact. Therefore, impacts would be less than significant.</p>				

Staff Recommended Mitigation Measures

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party ⁵	Monitoring/Reporting Method
<p>Biological Resources</p>	<p>MM BIO 1: General Species Avoidance and Minimization. If construction activity is conducted between September 1st and January 31st, then this mitigation measure is required prior to issuance of a grading permit. Federal Migratory Bird Treaty Act (MBTA) and/or state code protect all native bird species - both common and special status. In most scenarios, MSHCP coverage does not override the nesting bird protections provided by these. Impacts to nesting birds, both direct and indirect, can be minimized or eliminated by conducting work activities outside of the local breeding season. Although nesting can occur in any month in southern California for some species, breeding in the study area, given the habitat, would primarily be expected from about 1 February through 31 August. Work from about 1 September through 31 January would avoid most negative affects to birds and nesting activity. If work must be done during the breeding season, surveys for nesting birds should occur no more than three (3) days prior to all vegetation clearing and ground disturbance. If active nests are found, they should be avoided until young have fledged. While there is no established protocol for nest avoidance, when consulted the CDFW generally recommends avoidance buffers of about 500 feet for raptors and threatened/endangered species and 100 – 300 feet for non-raptors. Adherence to these nesting bird recommendations will also avoid and/or mitigate impacts to special status bird species known from the project site which are not covered by the MSHCP.</p>	<p>During Construction Activities.</p>	<p>Qualified Biologist</p>	<p>Evaluation</p>
<p>Biological Resources</p>	<p>MM BIO 2: Burrowing Owl. A focused BUOW survey must be conducted during the breeding season (four visits between 1 March - 31 August). Regardless of the result of those surveys, because of the presence of suitable habitat that could be occupied at any time, a one-day preconstruction survey must also be conducted 30 days or less before groundbreaking.</p>	<p>Prior to project-related disturbance to nestable vegetation</p>	<p>Qualified Avian Biologist</p>	<p>Pre-construction Nesting Survey (NBS)</p>

⁵ All agencies are City of Riverside Departments/Divisions unless otherwise noted.